PEEL: Police legitimacy (including leadership) 2017

An inspection of Nottinghamshire Police

Contents

Introduction

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

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

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

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

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

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[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%202_FINAL_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/nottinghamshire/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/nottinghamshire/.

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

3,064

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

officers	staff (including section 38)	PCSOs
1,837	**1,052**	**175**

Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

4.5%

officers	staff	PCSOs
4.5%	**4.8%**	**2.7%**

Percentage of BAME in local population, 2011 Census

11.2%

Gender diversity

Percentage of females in overall workforce 31 March 2017

Nottinghamshire Police	England and Wales population, 2015 estimate
41%	**51%**

Percentage of females by role 31 March 2017

Nottinghamshire Police

officers	staff	PCSOs
29%	**62%**	**49%**

Grievances

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

	Nottinghamshire Police	England and Wales force average
Officers	4.1	4.1
PCSOs	14.0	4.4
Staff	13.1	6.2

Stop and search

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

2,573

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

	Nottinghamshire Police	England and Wales force average
	2.3	4.8
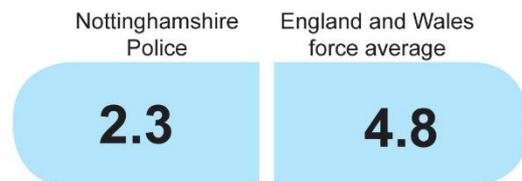
Note: All figures exclude section 38 staff unless stated otherwise. For further information about the data used, including information about section 38 staff, please see annex A.

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

Overall judgment[4]

Good

Nottinghamshire Police is judged to be good at how legitimately it keeps people safe and reduces crime. For the areas of legitimacy we looked at this year, our overall judgment is the same as last year. The force is judged to be good at treating the people it serves with fairness and respect. It is also judged to be good at how well it ensures its workforce behaves ethically and lawfully. The force is judged to require improvement still in some aspects of treating its workforce with fairness and respect.

Overall summary

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

Good

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

Good

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

Requires improvement

Nottinghamshire Police ensures that all members of its workforce have the understanding they need to treat people fairly and with respect. Ethics and values are well established in the force and guide leaders in the decisions they take. Officers and staff receive regular training on the use of coercive powers, such as stop and search and the use of force. In addition to the force's internal scrutiny of its activities, the force seeks external scrutiny from independent advisory groups, which provide effective challenge and advice.

Leaders in the force are good role models and ensure that members of the workforce behave ethically and lawfully. The force is taking steps to ensure that the whole workforce has appropriate vetting clearance but a considerable backlog remains in vetting for less sensitive posts.

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

The force makes it easy for people to make a complaint. Overall, it investigates complaints well, including those that involve potential discrimination. However, not all complainants are updated on the progress of an investigation in a timely way.

Nottinghamshire Police requires improvement in some aspects of the way in which it treats its workforce fairly and with respect. Leaders have a good understanding of the workforce's perceptions. However, officers and staff do not always feel able to challenge and offer feedback to senior managers. The force is proactive in identifying and resolving workforce concerns and its grievance procedure is perceived as fair. It is working to improve the diversity of its workforce, but recognises it could do more to improve diversity within its senior ranks.

The force has a comprehensive and accessible wellbeing programme and takes a preventative approach to improving workforce wellbeing. It has a wellbeing action plan to address the risks to the wellbeing of its workforce, such as the ability to take agreed leave. However, its individual performance assessment process is only partially effective. The force has no formal method for identifying and developing talented individuals, although the workforce views leadership selection and promotion processes as fair.

Areas for improvement

- The force should ensure that it uses the individual and organisational learning obtained from the scrutiny of information and data about the use of force to improve the way it treats people.

- The force should review its plan to ensure that by April 2018 it has achieved vetting clearance for all those people that it is required to clear.

- Force leaders should improve the extent to which they prioritise workforce wellbeing, particularly to ensure staff receive their entitled leave and time off to support their health and wellbeing.

- The force should make sure that it develops – and supports its supervisors and managers in conducting – fair and effective assessments, supporting continuous professional development and managing poor performance.

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 skills[7] in all

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

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

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

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

Understanding the importance of treating people with fairness and respect

The force continues to reinforce procedural justice principles. There is good progress on demonstrating the benefits of treating the public with fairness and respect through the force's shared values. Known as the 'PROUD' values, this acronym stands for: professional; respect for all; one team; utmost integrity, trust and honesty; and 'doing it differently'. These values are established within the force's policies and procedures, and are widely understood by the workforce. They are both aligned and consistent with the College of Policing's Code of Ethics.[9]

Good arrangements exist to give all staff the knowledge, skills and understanding they need to treat everyone they serve fairly and with respect. Over the last year, positive progress has been made in reinforcing the PROUD values. This has been done through regular force-wide bulletins, called 'In the Know', while newsletters, called 'Integrity Matters', contain lessons learned from complaints made by the public on the importance of treating people fairly and with respect. More recently, another publication, 'Our Priority Plan', clearly links the PROUD values to the force's mission and priorities. It, too, shows the force appreciates the importance of ethics in its work with the public.

Understanding of unconscious bias

Most officers, supervisors and managers receive specific guidance or training on identifying and understanding ways in which personal bias can affect how decisions are taken. For example, in dealing with the public, this is linked to the use of coercive powers, such as stop and search powers, and specific training is provided to managers when conducting selection board processes. However, unconscious bias training is not provided to all staff and some officers and staff we spoke to are less able to clearly demonstrate how their knowledge of the subject positively affects their interactions with the public. As a result, not all officers and staff can consistently demonstrate that they recognise unconscious bias and seek to overcome it, to be sure they make fair decisions. This is a gap which the force should understand and address.

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[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. 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, London, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

Communication skills

The workforce understands the importance of effective communication skills. Annual staff safety training for officers and police and community support officers includes a refresher course on the use of different communication techniques to de-escalate more volatile situations. Officers and staff can elect to attend courses on how to conduct challenging conversations and develop effective communication skills; those we spoke to say they apply the training to different situations, and note that body-worn video often records such encounters. Learning from these encounters is used to improve staff safety training. Staff in the control room receive regular training on holding more effective conversations with the public. The force uses opportunities to show the importance of different communication techniques and styles when speaking to different members of the community or, for example, when officers speak to people with a mental health condition.

Use of coercive powers

Officers and staff receive practical, online and classroom-based legal training on the use of their coercive powers. This is refreshed regularly, or more often if legislation changes. How well officers and staff understand the use of other coercive powers is reviewed in a number of different ways and performance is monitored. For example, if any officer or staff member over a 12-month period receives more than four complaints of any type, which includes an allegation of assault, or of the use of force on a person, they will be assessed for any recurring themes in their behaviour. If necessary, they will receive management advice about their complaint history and about apparent trends in their behaviour. The professional standards department (PSD) develops reports for the line manager to speak to the person, provide support and address underlying problems.

Officers and staff demonstrate their understanding of the national decision model and both the force's PROUD values and the Code of Ethics are given their due importance. For example, frontline officers and staff all carry and use body-worn video cameras to record all their evidential interactions with the public. Use of the video camera is mandatory during stop and search encounters and at incidents involving domestic abuse. Supervisors review their officers' interactions. Justification is required when the camera is not turned on at incidents.

This means that the workforce generally has a good understanding of its coercive powers, and of the importance of treating people with fairness and respect.

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

HMICFRS continues to examine the extent to which forces work to identify and understand what affects people's perceptions of fair and respectful treatment. This year we re-assessed a specific aspect of fair and respectful treatment that we

examined in PEEL 2015: the use of force[10] 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

The force has not regularly monitored and scrutinised the use of force to improve its fair and respectful treatment of people in a systematic way. The force recognises this gap in its understanding and, as a result, a 'use of force working group,' chaired by a chief inspector, now meets monthly to improve overall understanding. An action plan prioritises work, using the recommendations contained in a national report published by the Independent Police Complaints Commission (IPCC).[12] Any progress made is reported to a quarterly force-level meeting, the 'standards, integrity and ethics' board, which the deputy chief constable chairs.

The 'use of force' form complies with the national recording standard, and compliance is monitored to obtain the most accurate information. However, although completion of a form is mandatory when force is used on a person, no 'trigger' mechanism alerts supervisors of the need to complete a form, or of their need to review the incident. The ease with which the form is completed and checked is under review, to link it more easily to existing reporting mechanisms, but there is no completion date for this work. Supervisors do not routinely check body-worn video of incidents when force is used, nor does the PSD scrutinise them, unless it is as a result of a complaint; nor are they subject to external scrutiny from, for example, an independent advisory group. It is envisaged that the working group will conduct monitoring to identify trends and recurring problems but it is too early to say whether this is effective at improving fair and respectful treatment.

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[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

[12] *Use of force: evidence from complaints, investigation and public perception*, IPCC, March 2016.

External scrutiny to improve treatment

External independent advice is well established across the force area. Three independent advisory groups (IAGs) provide challenge and review police actions. The force's website contains clear information about – and access to – the IAGs and the work they do. This is also easy to find. The role of the IAG, its aims and the minutes of the meetings are all available. So are the personal profiles of the members and the ways in which members of the public can contribute to external scrutiny. Meeting regularly, IAGs provide the force with external challenge on a range of subjects. These include stop and search, hate crime, modern-day slavery, female genital mutilation and community cohesion. In addition to the force-level IAG there is a stop and search scrutiny panel and a lesbian, gay, bisexual and transgender IAG.

The force provides all IAG members with the training and support they need to carry out their roles effectively and observe and provide advice at force-level events. Those wishing to join apply to the independent chair. Many members have been on the IAG for several years. While this ensures a certain degree of continuity, it may limit more diverse engagement, and the force has plans to establish a young persons IAG. Two chief superintendents attend regularly, creating an identifiable means of contact with the force. Updates on progress are provided. Several recent examples show that IAG members are confident about challenging the force. They show also that the force listens to this advice and tailors its response as a result. Together, it means that the force receives wide-ranging advice from external scrutiny groups.

How fairly does the force use stop and search powers?

The purpose of stop and search powers is to enable officers to eliminate or confirm suspicions that individuals may be in possession of stolen or prohibited items, without exercising their power of arrest. Except in exceptional circumstances, an officer must have reasonable grounds for carrying out such a search. While this can be valuable in the fight against crime when based on genuinely objective reasonable grounds, the powers to stop and search people are some of the most intrusive available to the police. Their disproportionate use in respect of black, Asian and minority ethnic communities threatens to undermine police legitimacy. As such, it is crucial that all forces use these powers fairly, and demonstrate to the public that they are doing this.[13]

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

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.[14] Our 2015 legitimacy inspection[15] found that too many forces were not always recording reasonable grounds on their stop and search records. In 2017, we reviewed the reasonableness of the grounds again to assess how fairly forces are using stop and search in line with national guidance.[16] Also, we assessed how the forces scrutinise use of these powers.

Understanding of national guidance

Officers have a very good understanding of how to use their stop and search powers fairly and respectfully. HMICFRS' 2015 legitimacy report concluded that Nottinghamshire Police officers fully understand the Best Use of Stop and Search scheme, and that the force complied with every aspect of it. Officers receive comprehensive training on using their stop and search powers fairly and with respect. All front-line officers are trained in the use of stop search powers. The force has reviewed the recently introduced College of Policing authorised professional practice (APP), and has decided that officers' training already covers most of the critical elements. Our review of stop and search forms, and of how well officers understand reasonable grounds, shows that the force is particularly effective in this area.

Training for officers, including special constables, has taken place over five phases in the last four years. This includes: understanding the experiences of young people from black and minority ethnic communities; behaviour detection, to improve the number of searches in which the outcome is positive; improving awareness of unconscious bias, to ensure searches are legal, necessary and proportionate; the use of stop and search powers in the context of the national decision model and Code of Ethics; guidance on searches based on the smell of cannabis alone.

Monitoring use of stop and search powers to improve treatment

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In 2015/16 in the local

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

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

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

population of Nottinghamshire Police, black, Asian and minority ethnic (BAME) people were 2.5 times more likely to be stopped and searched than white people. Black people were 4.7 times more likely to be stopped and searched than white people, which is the greatest difference in any ethnic group in the force area when looking at the likelihood of being stopped and searched compared with white people.

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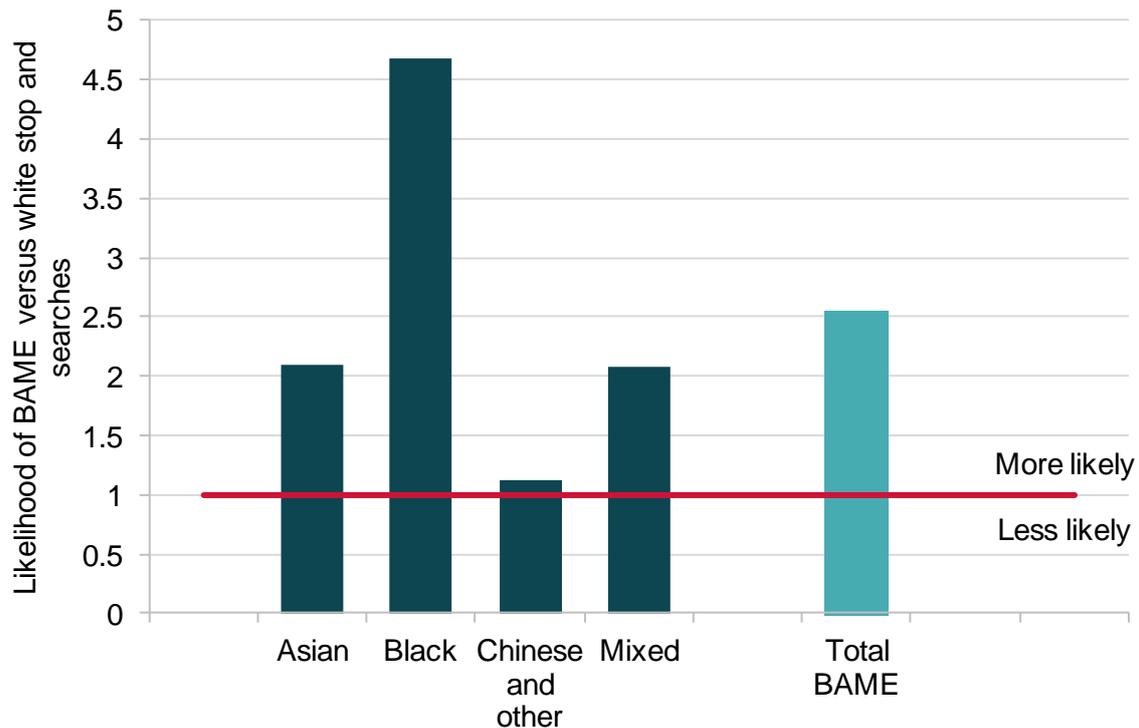
Source: Home Office 2016

The force continues to look closely at how well officers use their stop and search powers, to improve treatment of the public. Robust, effective arrangements for comprehensive management and oversight are in place, drawing on a range of data. For example, these can identify an officer who conducts high numbers of searches, or whose searches disproportionately target certain groups. This officer's role and patrol activities can then be reviewed. The system broadens the force's overall knowledge of the use of stop and search in its area.

The force expects its officers to use their powers to concentrate on crimes that cause the public the most concern, such as burglary, robbery and carrying weapons. The force aims for at least 25 per cent of all stop and searches to result in an arrest or a positive outcome, excluding any cannabis warnings. However, these data include arrests and outcomes that do not directly relate to the original reason for the search.

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

For instance, they include occasions when nothing was found during a search for drugs but when the person was arrested, having become disorderly during or after the search. A better aim would involve outcomes connected directly to discovery of the item that was searched for. In our review of 200 stop and search records, we found that 162 were carried out to search for drugs, of which only 31 were for the more serious, supply-type offences. In other words, 131 searches were for possession alone. This suggests that a high proportion of stop and search encounters are being carried out solely on suspicion of possession of drugs. This does not align with the force's expectation that officers use their powers to focus on crimes that cause the public the most concern, such as burglary, robbery and carrying weapons.

The force can analyse data down to ward level. This provides it with more accurate figures and enables it to identify quickly any potentially disproportionate use of stop and search. Analysis by the force to understand the disproportionate number of BAME people stopped and searched shows that this may be as a result of the BAME population being concentrated in the city area. This affects the figures when the totals are combined with the rest of the force area.

The force also records the views of young people, including those from BAME communities, while effective systems record and analyse stop and search encounters. The relevant figures are then published on the force's website, including publication of 'outcomes'. This shows whether the outcomes link to the discovery of the object that was searched for, and what happened to the person who was searched. For example, it shows whether the person was arrested. Oversight and understanding of the use of these powers is effective.

External scrutiny of stop and search powers to improve treatment

Effective external scrutiny of stop and search powers is conducted by a quarterly stop and search scrutiny panel. This includes members from the force-level independent advisory group and representatives from the Youth Commission. Young people are invited to attend, and separate work is being undertaken to ascertain their views. A member of the community usually chairs the meeting. The panel reviews stop and search data and body-worn video footage of stop and search encounters. The panel members have received sufficient training to be confident about challenging any of the findings. Although the level of complaints is low, and complaint data are provided, the panel chooses to not always examine complaint cases that arise from people being stopped and searched. The PSD investigates all such complaints and explains to the panel how the powers are used and what has been done as a result of the complaint to improve standards and training. The stop and search scrutiny panel is satisfied with the actions that the force is taking, and with the continuing effects on the use of stop and search powers by its officers. The force is also developing a video to explain stop and search powers, called 'knowing

your rights, together with an online survey, to provide the force with feedback on how well people who have been searched are treated. Opportunities also exist for the public to accompany officers on patrol.

Reasonable grounds for use of stop and search

The Police and Criminal Evidence Act 1984 requires that, to stop and search a person, there must be reasonable grounds to suspect that this person is in possession of a stolen or prohibited article. The grounds must also be recorded on the stop and search record.[18]

In our 2013 inspection into the police's use of stop and search powers,[19] we were concerned to see that, of the 8,783 stop and search records we examined across all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power. For Nottinghamshire Police, the 2013 inspection showed that 20 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,[20] we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, our review found that three of 100 records examined did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 200 stop and search records and found that five did not have grounds recorded that we considered reasonable. It is important to note that a lack of reasonable grounds on the stop and search record does not necessarily mean that reasonable grounds did not exist at the time of the stop and search.

In 58 of the 200 records we reviewed, the item searched for was found. This is an important measure, as 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.

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

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

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

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

	2013	2015	2017
Records not containing reasonable grounds	20 of 200	3 of 100	5 of 200
Item searched for found	-	-	58 of 200

Summary of findings

 Good

Nottinghamshire Police is good at treating the people it serves with fairness and respect, which the force has included as one of its shared values. The force ensures that all members of the workforce have the knowledge, skills and understanding they need to treat people fairly and with respect. However, not all members of the workforce receive unconscious bias training, and not all officers and staff we spoke with could demonstrate a clear understanding of unconscious bias and how to overcome it. The workforce understands the importance of effective communication skills and how to apply these in practice.

Officers and staff receive practical, online and classroom-based legal training on the use of their coercive powers, which is refreshed regularly, and the force monitors their understanding and use of these powers. The force has introduced a use of force working group that meets monthly. This group scrutinises the use of force to ensure people are treated fairly and with respect. The force also works with independent advisory groups who provide external challenge; it provides group members with the training and support they need to carry out their roles effectively.

The force provides officers with comprehensive training on using their stop and search powers fairly and with respect. It has robust and effective arrangements for managing and overseeing the use of stop and search that draw on a range of data. The force can identify quickly any potentially disproportionate use of stop and search. A quarterly stop and search scrutiny panel provides effective external scrutiny of use of stop and search powers.

Areas for improvement

- The force should ensure that it uses the individual and organisational learning obtained from the scrutiny of information and data about the use of force to improve the way it treats 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,[21] as opposed to last year's focus on how well forces are guarding against corruption.[22]

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

Research tells us that the best way to prevent wrongdoing is to promote an ethical working environment or culture.[23] Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.[24] 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.[25]

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

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

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

[24] 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/

[25] 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

Leaders are positive ethical role models and maintain the values that the force expects of them. Ethics and values are well established in the force and guide its leaders' decision making. The chief officer team reinforces these values during planned visits to different workplace locations across the force area. In addition, the standards of behaviour expected and the annual performance review system highlight the expected professional boundaries for the whole workforce. At a recent senior leadership conference the way leaders will be assessed emphasises values such as integrity, transparency and impartiality. Details of chief officer pay, rewards, business interests, and gifts and hospitality are made available. This information is up to date and easy to find and understand on the force website.

In last year's (2016) legitimacy report, HMICFRS identified an area requiring improvement. This was to ensure that the force's expectations of leadership were clearly understood across the force – particularly among frontline officers and staff. A recent online survey, which asked the workforce: 'What does a good leader look like to you?', attracted over 300 replies. These responses helped develop six main expectations about how leaders should lead. Together with clear messages on the force's 'priority plan', this means the force is ensuring that its workforce behaves ethically and lawfully, and that expectations of leadership are communicated well.

Ethical decision making

The workforce has a good understanding of the Code of Ethics and the force clarifies and reinforces expected standards of behaviour in a number of ways. A professional standards, integrity and ethics board, which meets quarterly, enhances an ethical approach to taking decisions. Chaired by the deputy chief constable, the board monitors standards of behaviour, including force-level data on complaints, employment tribunals and workplace fairness concerns. Policies and procedures are reviewed to consider any implications they may have on equality, while the force provides initial and refresher training on ethical decision making. The officers and staff we spoke to also say they have a more positive attitude towards admitting their mistakes, which helps them to learn from them.

There is also a quarterly 'people's board', a consultation forum at which suggestions and ideas from the workforce – and occasionally ethical issues – are discussed. Some officers and staff we spoke to during the inspection now feel more confident about challenging decisions made by their leaders, and many feel encouraged by the accessibility and openness of the new chief officer team. Ethical dilemmas are discussed in an open and transparent way. A recent decision to introduce free travel for police officers and staff across the county was carefully considered to ensure that

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

it was ethically appropriate for the organisation. However, these decisions receive no external or independent input. This would strengthen independent oversight of issues of integrity.

Vetting

During our 2016 legitimacy inspection, HMICFRS considered the extent to which the force was ensuring it was developing and maintaining an ethical culture through effective initial vetting. Owing to structural changes in departments and a new, shared service function, introduced in April 2015, the force could not be sure that it was vetting all staff in designated posts to the correct level.

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 Nottinghamshire 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, 91 percent of officers and PCSOs, and 87 percent of staff had up-to-date security clearance, as illustrated in figure 2. The data provided for officers also include PCSOs, as it was not possible to separate figures due to the way the information is recorded within the force.

Figure 2: Percentage of officers, PCSOs, and staff with up-to-date vetting checks, in Nottinghamshire Police as at 31 January 2017
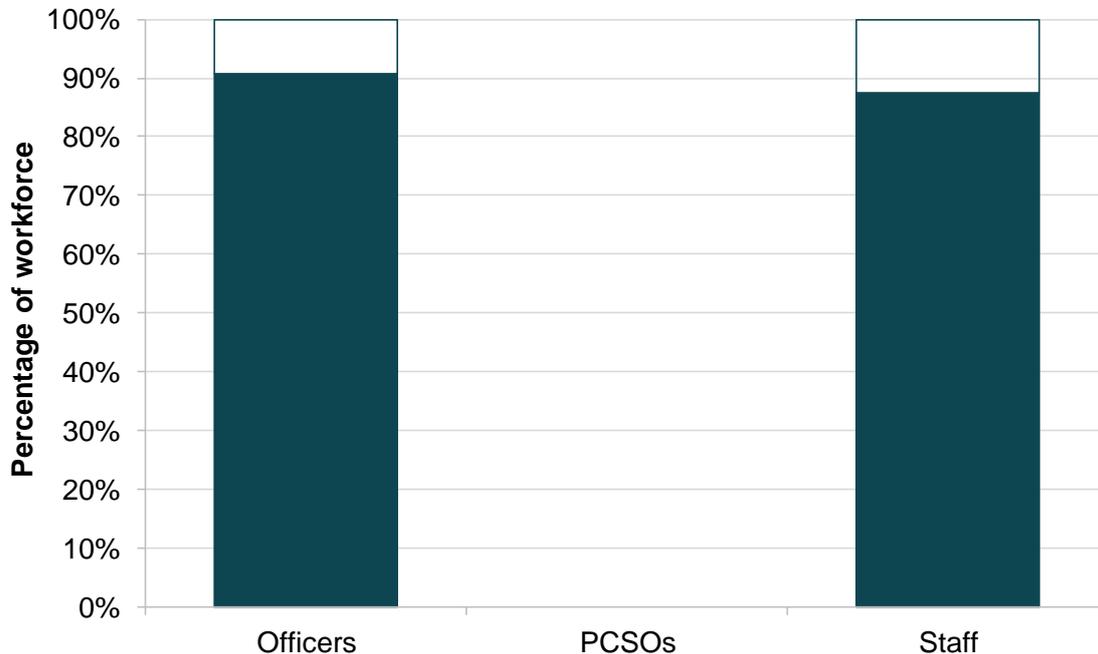
Source: HMICFRS Legitimacy data collection

During this year's inspection, we assessed the force's plan to deal with this. We found that the force has reduced the backlog in people awaiting vetting and that, in consequence, it has reduced its exposure to risk in these more sensitive posts. More robust processes and a more stable team are now in place to complete vetting

applications. However, HMICFRS remains concerned about the considerable backlog in vetting less sensitive posts. The force has also not completed all retrospective vetting for officers and staff who joined before the national vetting policy was adopted in 2006. The force plans to complete this work by April 2018. This goal appears partially credible and achievable because the force also processes vetting applications on behalf of another organisation, and backlogs have arisen with these arrangements, too. Overall, the force cannot be confident of its ability to monitor potential or emerging risks to the integrity of both organisations.

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.[26] 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

Making a complaint is fairly straightforward. Complaints can be made by letter, phone call, email or through a web form on the force website. The website contains information on how to make a complaint. The link to complaints information on the homepage is prominent. There is also a 'translation button', and large print and 'easy read' versions are to be found on the front page. Making a complaint, therefore, is generally easy. However, the website does not state the independence of the PSD from the person being complained about and there is no frequently asked question page. That could provide helpful information about the process. The website publishes information about how to appeal, and, in addition, there is a contact email address if people require additional assistance due to a disability. HMICFRS examined 25 public complaints and found only one case in which the complainant needed additional assistance. This was correctly identified and suitable arrangements were made.

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[26] 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

The force does not routinely publish complaints data on its website but instead provides a link to the Independent Police Complaints Commission homepage. It is also hard to see what changes the force has made as a result of complaints and feedback received from the public, especially in relation to the use of force on a person, including the use of Taser, and of stop and search powers. The force has an opportunity to be more transparent about its response to its own internal monitoring arrangements and to public concerns. This could increase public confidence in the extent to which the workforce treats people with fairness and respect.

HMICFRS checked a number of police station front counter areas and found no printed information available, such as posters and leaflets, on how to make a complaint. However, staff who work at the front counters are able to explain the procedure, and supervisors are well equipped to deal with complaints fairly.

Overall, making a complaint to Nottinghamshire Police is fairly easy and all complaints are recorded. This means that most members of the public should feel confident and supported about reporting a complaint.

Keeping complainants updated

Limits to the capacity of the PSD mean that inspectors, who are based near where the complainant lives, or where the alleged incident took place, deal with some investigations. This can lead to a delay in an investigation, while the complaint is assessed in the PSD and transferred. Overall, complaints are handled well and an appropriate investigation takes place. HMICFRS examined 25 public complaint cases. It found a good standard of investigation in most cases, and that the updates provided complainants with sufficient information. However, six of the 25 complainants did not receive updates on the progress of investigations. Thirteen misconduct cases were also examined. The standard of these investigations was also good, although in three cases, we found that those involved did not receive sufficiently informative updates.

When forces record public complaints, the Police Reform Act 2002 and Police (Complaints and Misconduct) Regulations 2012 legislation requires them to provide the complainant with a copy of the complaint record. The IPCC statutory guidance extends this by stating that complainants should receive an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing with it (including contact details). Of the 25 complaint files that we examined, each contained evidence that all of these legal requirements had been met.

When work on public complaints is completed, the force is also required to provide the complainant with the findings of the report, its own decision and the complainant's right of appeal. Of the 25 complaint files that we examined, each contained evidence that all of these legal requirements had been met. This means that in the majority of cases, staff in the PSD and local investigators are investigating

complaints well and explaining the final outcome in a way that a complainant understands. The force needs to ensure complainants are appropriately updated on progress of an investigation. These findings are consistent with our findings in 2015.

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.[27]

Identifying and responding to potential discrimination

The workforce has a good understanding of what discrimination is and of the impact it can have on people. For example, Nottinghamshire Police is a Stonewall diversity champion and participates in the Stonewall workplace equality index each year. This tool measures work on LGBT equality against best practice. The index ranks the force in 35th place out of over 439 organisations.

The PSD has made good arrangements to identify discrimination. As well as the cases the force had already identified as containing allegations of discrimination, HMICFRS looked at another 15 public complaints and ten internal misconduct cases that we considered might contain unidentified allegations of discrimination. We only found one internal misconduct case that contained an allegation of discrimination that the force had failed to identify. The force also complies with requirements and correctly refers cases concerning potential discrimination to the IPCC. This means that, apart from the one case, the force correctly identifies and responds appropriately to initial reports of discrimination, referring the more serious allegations to the IPCC for it to consider, as legislation requires.

There is no independent review of potential discrimination, as the IAG does not review or take dip samples of complaints. Although the IAG and the force meet regularly, there is no particular focus at these meetings on cases of discrimination – partly because IAG members are not appropriately vetted. Learning from complaints and misconduct matters is discussed at a monthly organisational risk and learning

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[27] 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

board, which the deputy chief constable chairs. The force conducts a survey of people who have submitted a complaint in order to find out how they could improve the service provided. Learning drawn, for example, from serious case reviews, employment tribunals and civil claims, is then shared with the workforce in a monthly newsletter called 'Integrity Matters'.

Investigating allegations of discrimination

The force investigates cases of discrimination well. All investigators display an ability to appreciate and identify discrimination allegations in determining recording decisions. However, many public complaint files do not record the ethnicity of the complainant, which makes it more difficult to ascertain potential discrimination problems. Well-trained investigators in the PSD handle most discrimination cases. All investigating officers appointed to deal with discrimination allegations have a good understanding of equality and diversity issues and have the knowledge, skill and experience to be able to effectively apply the IPCC guidelines for handling allegations of discrimination. Where managers on divisional teams deal with less serious and more straightforward cases, their PSD colleagues provide appropriate advice and support.

The force deals with a significant proportion of its public complaints through a process called local resolution, and resolved 15 of the 25 files that we examined this way. We considered this an appropriate way to handle these complaints. HMICFRS examined 10 public complaint cases that the force had recorded as containing an allegation of discrimination. We considered whether these allegations had been investigated satisfactorily in accordance with the IPCC guidelines on handling allegations of discrimination. We found they had received a good service and that all the cases had been investigated satisfactorily. This means that allegations of discrimination are handled in a timely way, with complainants, witnesses and subjects of allegations all receiving the support that they need.

The force also seeks to understand and respond more positively to people who are more vulnerable. For example, the force is working to improve ways in which it deals with victims of hate crime, domestic violence and burglary. Surveys of these victims are contributing to more respectful and fair treatment by the force. The force's engagement team uses the results from the police and crime commissioner's twice-yearly surveys and focus groups to understand which issues have the greatest effect on public perceptions of fair and respectful treatment. This means that the force has a better understanding of potential discrimination, and its investigation of discrimination cases is good when they are recorded accurately. The IAG, if its members were appropriately vetted, could provide further independent challenge.

Summary of findings

Good

Nottinghamshire Police is good at ensuring that its workforce behaves ethically and lawfully. Leaders are positive ethical role models. Members of the workforce have a good understanding of the Code of Ethics and are guided by ethics and values in their decision making. The force clarifies and reinforces expected standards of behaviour. It is taking steps to reduce the considerable backlog in vetting for less sensitive posts.

The force makes it easy for people to make a complaint by letter, phone call, email or through a web form on the force website. The website includes a translation button, and large print and 'easy read' versions; there is also a contact email address for people who require additional assistance due to a disability. However, no printed information on how to make a complaint is available at police station front counters. Overall, the force investigates complaints well, including those that involve potential discrimination. However, not all complainants are updated on the progress of an investigation in a timely way.

Officers and staff have a good understanding of discrimination and the effect that it has. The force identifies and responds appropriately to initial reports of discrimination and refers more serious allegations to the IPCC, as required by law. It investigates allegations of discrimination well, with complainants, witnesses and subjects of allegations all receiving the support that they need.

Areas for improvement

- The force should review its plan to ensure that by April 2018 it has achieved vetting clearance for all those people that it is required to clear.

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

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and types of behaviour.[28] As such, this concept of 'organisational justice', and its potential effect on 'procedural justice' forms an important part of HMICFRS' assessment of police legitimacy and leadership. As no comparative data exist on how fairly officers and staff perceive forces have treated them, we continue to focus our assessment on how well forces identify individual and organisational concerns within their workforces and act on these findings.

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

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

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.[29] HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances[30] – to identify, understand, prioritise and resolve their workforces'

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[28] *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf and *Organisational justice: Implications for police and emergency service leadership*, Herrington, C. and Roberts, K. [AIPM] Research Focus, Issue 2, 2013. Available at: www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf

[29] *Ibid.*

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

concerns. Part of our assessment involved reviewing a small number of grievance cases to assess if these adhere to Acas guidance and the Code of Practice.[31]

Unfairness, or perceived unfairness, in recruitment processes, opportunities and limited career progression can lead to good officers and staff leaving the service prematurely and fewer women and people from black, Asian and minority ethnic (BAME) communities wanting to join the police in the first place. As such, we re-examined how well forces address disproportional workforce representation in a variety of areas – including recruitment, retention and progression for those people with protected characteristics.[32] We looked at the treatment of BAME officers and staff subject to allegations of misconduct – to improve fairness at work and to make forces more representative of the communities they serve.[33]

Leaders seeking feedback and challenge from the workforce

Further progress has been made since the last inspection on improving organisational justice, although there are still some gaps, which the force recognises.

In last year's (2016) legitimacy report, we advised the force to improve the ways in which it communicates the action it has taken in response to issues that the workforce has identified. Good progress has been made to make sure that the actions taken are visible. The chief officer team works closely with staff associations, unions and staff networks to identify concerns that affect workforce perceptions of fair and respectful treatment. This is the second year that the force has run an annual staff survey, developed by Durham University.

There was a good response rate of 31.5 percent to this survey, which looks at elements of fairness, support and ethical leadership. The force has drawn on analysis of the results to improve wellbeing support and job satisfaction. There are also plans to conduct more regular, targeted surveys on important areas that the annual survey has brought to attention. The force also encourages feedback and challenge in other ways, for example, through exit interviews with officers and staff. A 'people's board' discusses ideas and suggestions, some of which are taken forward for further development. For example, to make senior promotion boards

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

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

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

fairer, a suggestion to establish a stakeholder panel, where the workforce could submit questions, is now in place. This means that the force considers wider organisational implications.

The chief constable and senior team visit different workplaces across the force area. Officers and staff we spoke to explain that when problems are raised, they are addressed immediately. When they cannot be resolved, an explanation is provided and included in the chief's online blog. This promotes trust and confidence. However, while most officers and staff we spoke to say they feel confident about challenging their immediate line managers, some feel far less confident about challenging more senior managers above the rank of chief inspector.

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 Nottinghamshire Police had 7.7 grievances raised per 1,000 workforce. This is higher than the England and Wales average of 4.9 grievances raised per 1,000 workforce.

Figure 4 shows that the number of grievances raised by officers in Nottinghamshire Police was 4.1 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 14.0 grievances per 1,000 PCSOs, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 13.1 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 Nottinghamshire Police in the ten months from 1 April 2016 to 31 January 2017
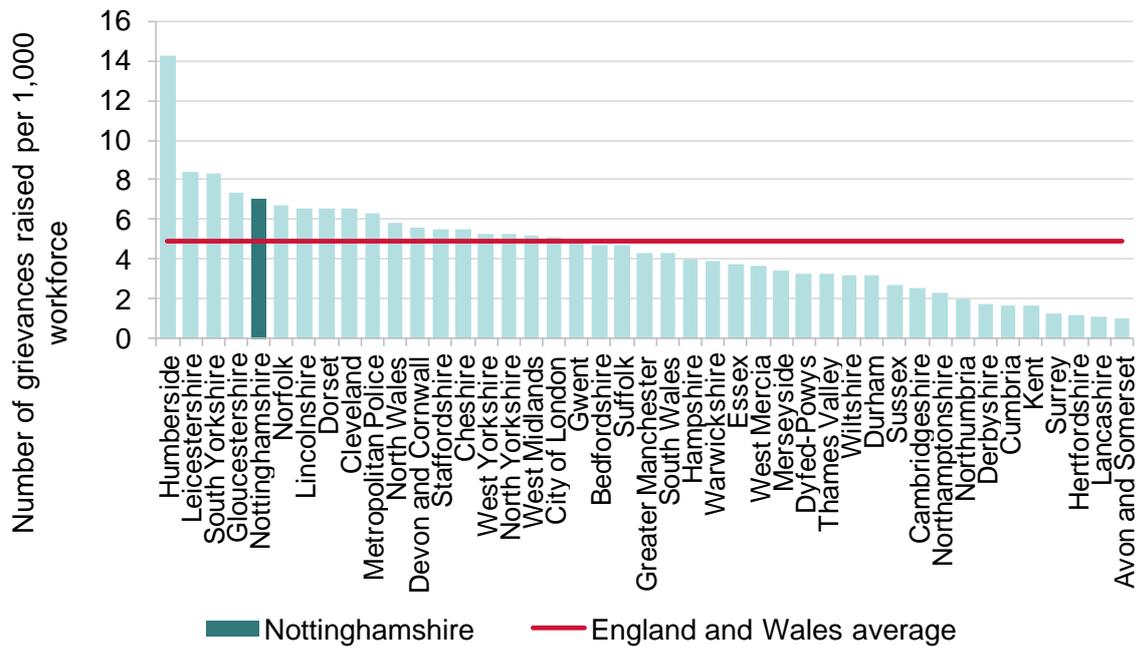
Source: HMICFRS Legitimacy data collection

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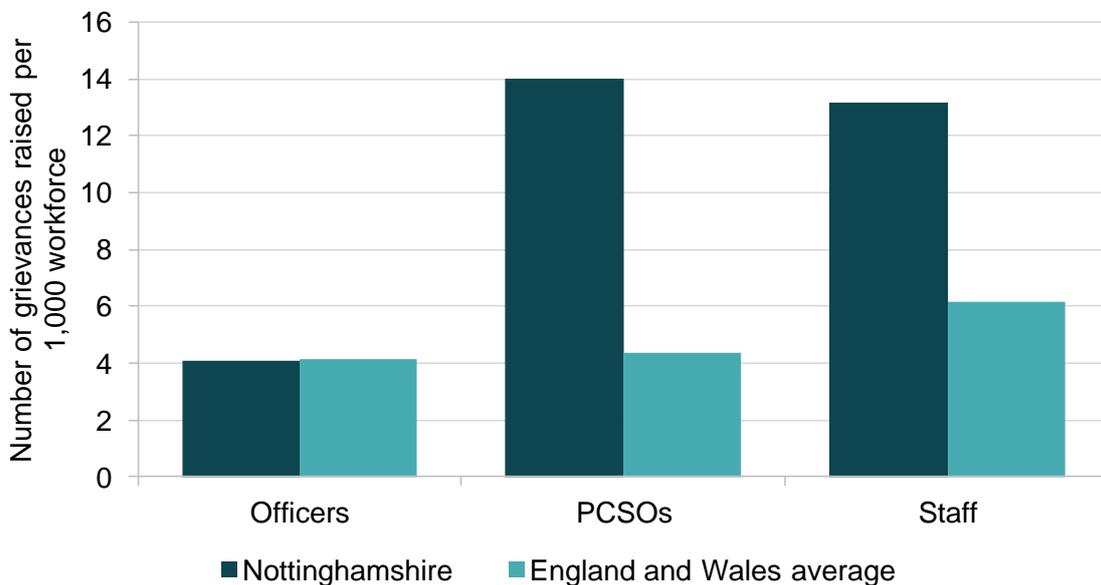
Source: HMICFRS Legitimacy data collection

Grievances are an important way for individuals to raise concerns (often about fair and respectful treatment), which they expect to see resolved. The force proactively identifies and resolves workforce concerns. Officers and staff say these concerns are often dealt with quickly, without the need to resort to more formal procedures. Supervisors felt supported in their decisions by their line managers. The grievance

procedure is perceived as fair. HMICFRS reviewed ten grievance cases and found that in all but one the force had properly identified, investigated and resolved the grievance in line with the Advisory, Conciliation and Arbitration Service Code of Practice on discipline and grievance.[34] In all grievance cases, we found a record of the appropriate arrangements taken to support the employee or witnesses throughout the process.

Regular meetings and forums involving staff networks and associations combine feedback from the workforce with wider management information, on matters such as the diversity of the workforce across different ranks, or on referrals to professional standards. This all helps the force to identify organisational as well as individual problems. An equality, diversity and human rights strategic board, chaired by the head of human resources, monitors timeliness and outcomes and reports trends to the force executive board.

In last year's (2016) HMICFRS legitimacy report, we reported that officers and staff we spoke to had a negative perception of the PSD. They thought it took too long to investigate complaints and failed to provide regular updates on progress. However, these perceptions are changing. Staff we spoke to feel more confident that the situation has improved. There is a general sense of optimism, and the relationship with the PSD is far better, compared to last year. For example, there has been a change in some personnel who work in PSD and officers feel very positive about the use of body-worn video, noting that it has reduced the amount of complaints to the PSD, which is also able to resolve problems at an earlier stage, without the need for an investigation.

**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 Nottinghamshire Police, the 2011 census indicates that BAME people made up 11.2 percent of the local population. In 2016/17, in Nottinghamshire Police, 4.5 percent of officers were BAME (see figure 5). In relation to officers, 13.3 percent of those joining the force, none of those in senior ranks and 3.6 percent of those who had served over 20 years were BAME. On a positive note, Nottinghamshire Police has seen an increase in the BAME proportion of the workforce, from 3.5 percent in 2007 to 4.5 percent in 2017.

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[34] For more information, see: www.acas.org.uk/index.aspx?articleid=2174

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 Nottinghamshire Police in 2016/17, compared with the percentage of BAME people in the local population
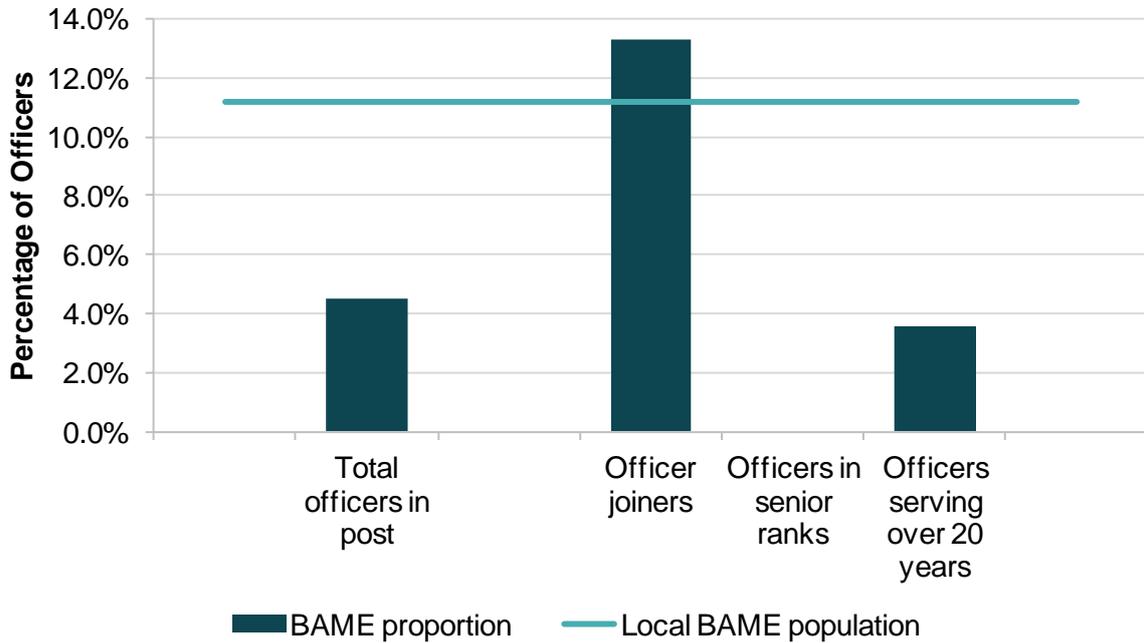
Source: Home Office Annual Data Requirement
Note: High percentages may be due to low overall numbers. The figure above represents officers where an ethnicity was stated.

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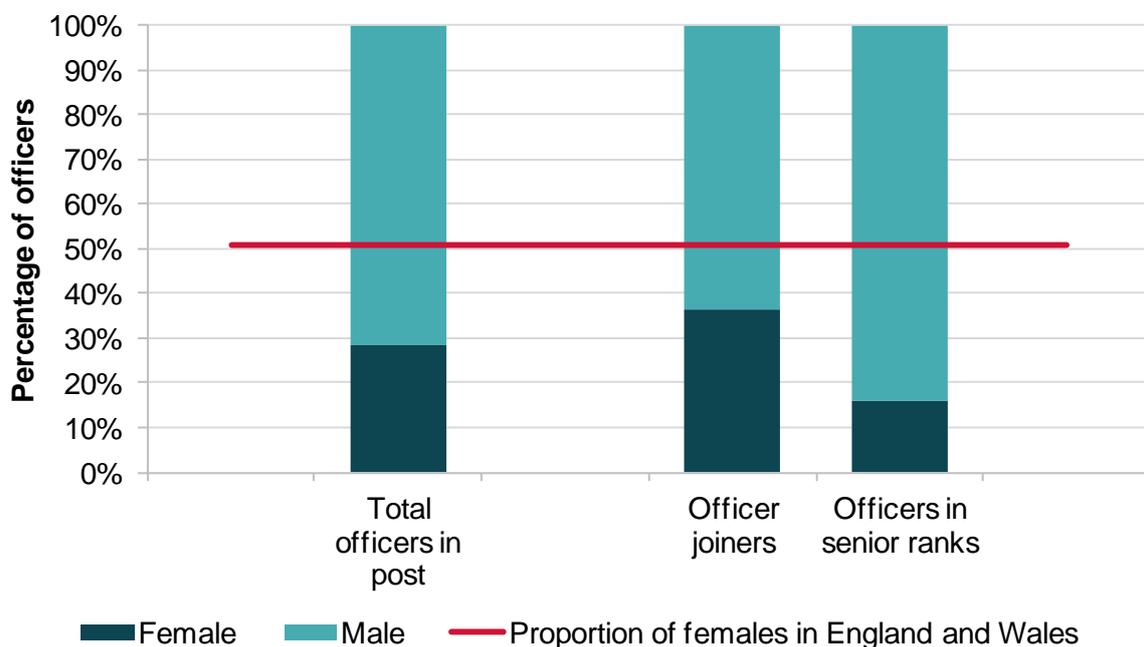

Source: Home Office Annual Data Requirement

In 2016/17, in Nottinghamshire Police, for the equivalent of every 1,000 BAME officers, 68 left the force (see figure 6), while for every 1,000 white officers, 81 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

The proportion of female officers, at 29 percent, is lower than the proportion of females in the general population (51 percent). In the 12 months to 31 March 2017 in Nottinghamshire Police, 36 percent of those joining the force and 16 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 Nottinghamshire Police in 2016/17 compared with the percentage of women in the England and Wales populatio

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 Nottinghamshire Police from 2007/08 to 2016/17
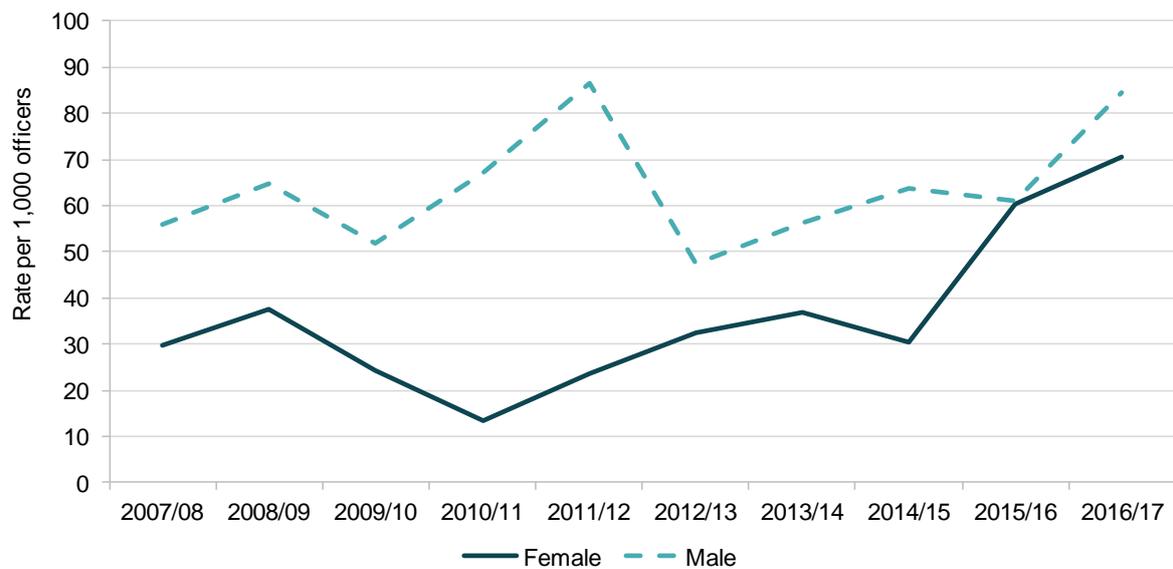
Source: Home Office Annual Data Requirement

In 2016/17 in Nottinghamshire Police, 71 female officers per 1,000 officers left the force, compared with 84 male officers per 1,000 officers. Workforce planning arrangements ensure there is a long-term plan to allocate people to different roles and help the organisation to meet different demands. Meeting regularly, the workforce planning board looks closely at data on the recruitment, retention and progress of officers and staff, including those with protected characteristics. The force's equality, diversity and human rights strategic board also reviews workforce information and data on protected characteristics. It tackles disproportionality, for example, by co-ordinating an impressive recruitment, retention and progression plan, designed to develop a more diverse workforce.

Considerable effort is being made to encourage people from diverse or under-represented communities to join the force. A series of recruitment events is taking place, which include members of the staff networks getting involved to encourage applicants. A positive action co-ordinator seeks out new opportunities to promote the force, for example at local universities and community events. The force understands the importance of addressing potential disproportionality in the retention and progression of people from the BAME community. Mentoring and coaching are available, focusing in particular on promotion processes. This also involves training on unconscious bias for those involved in the process of selecting inspectors. The force has also conducted confidential interviews and workshops with 30 BAME officers and staff to understand better the barriers to progression. As a result there is increased support through mentoring and coaching; and confidence-building and interview skills training provided by an external company.

The force has a good record of retaining those officers and staff with protected characteristics, while BAME officers and staff are not disproportionally subject to

complaint or misconduct allegations. An acting and temporary promotion procedure for officers has been developed with the assistance of staff associations. The chief constable recently reviewed this procedure and temporary promotions over 12 months to make the process fairer and more transparent. However, the force recognises that it could still do more to improve diversity within its senior ranks.

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

Over the last year, the force has continued to develop its understanding of the benefits of workforce wellbeing. New impetus has been provided to this area, and the force has made being designated an 'employer of choice' a priority. It expects that a new health and wellbeing group will enhance the wellbeing of the workforce through a preventative approach. The force has completed a workforce self-assessment, which will shape priorities and a future action plan, and several areas have been identified as requiring improvement, including mental health. The force is part of the Blue Light 'Time to change' pledge, established by the mental health charity Mind, which demonstrates its support for tackling mental health stigma and discrimination within the workplace. Once a wellbeing strategy and an action plan are agreed, HMICFRS expects them to influence operational policies and processes. Most of the officers and staff we spoke to said their immediate supervisors and managers support their wellbeing and understand their wellbeing responsibilities.

Identifying and understanding workforce wellbeing needs

The force has a good understanding of the risks and threats to the wellbeing of its workforce, and of the causes of these risks and threats, including an emphasis on mental and emotional wellbeing. The force undertakes good analysis of

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[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/

management information – for example, the data on assaults on officers and staff – to identify and understand patterns and trends, and so put in place support for the workforce.

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 Nottinghamshire Police, 2.0 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 0.5 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 Nottinghamshire Police compared with the England and Wales average, on 31 March from 2008 to 2017
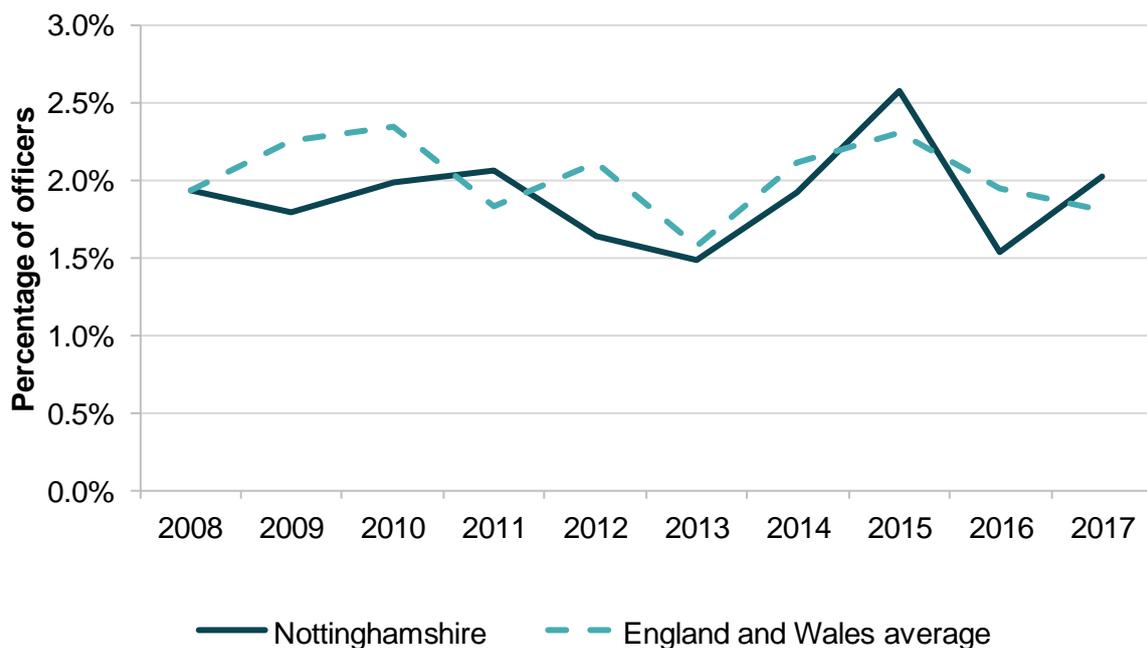
While the percentage of officers on short or medium-term sick leave is higher than the England and Wales average, the force continues to demonstrate a good commitment to managing short as well as long-term sickness well. However, staff still feel unable to manage their time off, or feel it is difficult to do so. This is partly down to a problem with the system in use, and we highlighted this matter in the force's (2016) effectiveness report. In addition, in last year's (2016) legitimacy report, we advised the force to make sure staff receive their annual leave entitlement and can take the rest days owed to them. On 31 March 2017, the proportion of officers in

Nottinghamshire Police on long-term sick leave was 2.0 percent and the England and Wales average was 1.9 percent. The latest year for which data were available is 2017, which saw an increase of 0.6 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 Nottinghamshire Police compared to the England and Wales average, as at 31 March from 2008 to 2017
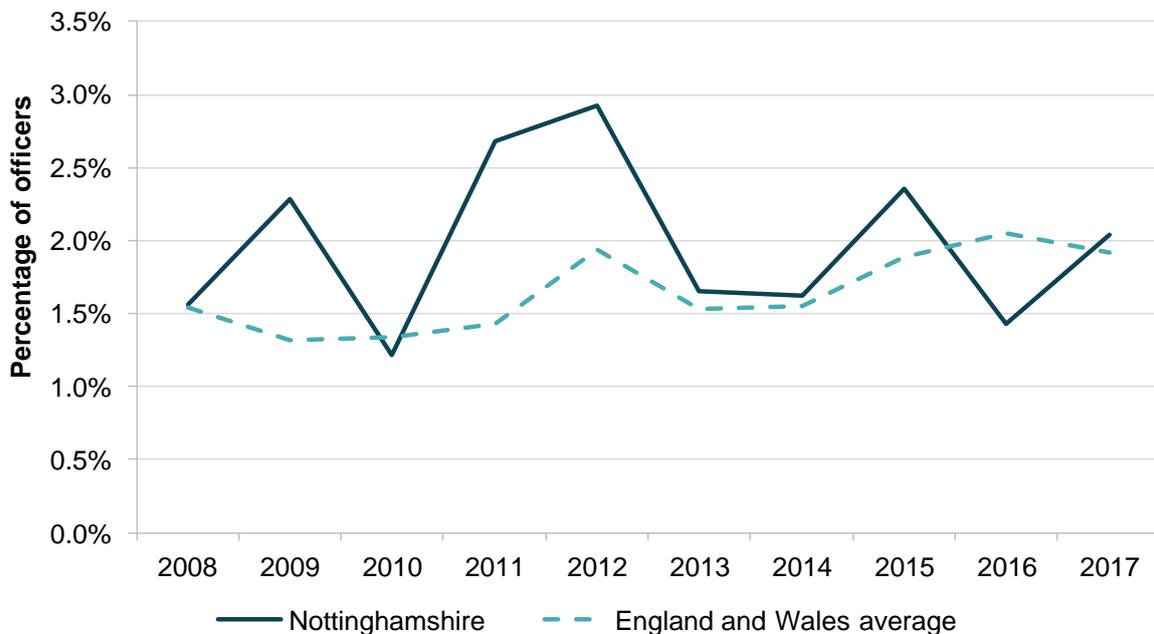
Source: Home Office Annual Data Requirement

The force could not provide data in all areas to compare it with other forces. HMICFRS also found that requests for annual leave and time off are not always well managed and that delays occur in updating the system of posting changes. The force intends to conduct a review of this matter and, until such changes occur, many officers and staff may recognise their force is taking some action to improve the workforce's wellbeing, even if the effect of this activity is not always seen or felt.

Taking preventative and early action to improve workforce wellbeing

Some early action is being taken to improve the wellbeing of the workforce. Effective preventative measures exist to improve workforce wellbeing. Most supervisors are sufficiently well equipped to recognise individual warning signs and intervene early on, to prevent problems from escalating. However, there is still a lack of integrated welfare support, particularly when officers and staff are absent from work long term owing to a complaint or to a misconduct allegation. Our file review of 13 internal misconduct cases found that in 12 of the cases the witnesses and the subjects to the allegations received updates, ten of which were timely and meaningful. Despite that, officers and staff say not enough trained welfare support is available.

The force intranet clearly shows officers and staff how to find and access a range of health schemes. Together, they make up a comprehensive and accessible wellbeing programme. The website also offers practical advice on how to access other support services. Early intervention is practised to prevent work-related stress from escalating. For example, if staff members experience a traumatic incident, the procedures in place include referrals to counselling. An aide memoire assists supervisors in conversations during the performance development review.

There are plans for all supervisors and managers to spot the early signs and symptoms of mental ill health and stress. However, in some parts of the force, such as in the pressurised environment of the force control room, the work can be more stressful and sickness rates are correspondingly higher. Welfare here is monitored closely. However, a significant number of officers who are restricted in the duties that they can perform – because of illness or injury – work in the crime and incident management team. With a considerable number of officers absent as a result of sickness, the force should consider how well such work aids their recovery.

There is a good level of help and support, and referral arrangements to occupational health are swift and effective. There is renewed support for improving physical health by re-establishing gym facilities that the workforce have easy access to. A recent campaign to support officers when they have been assaulted is positive.

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

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[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

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

In last year's (2016) legitimacy report, we advised the force to improve its management of individual performance. The force has made some progress here, but it is still only partially effective at managing and developing individual performance. It introduced an online personal development review (PDR) system last year. This is improving compliance and the response rate to ethical 'health checks' has risen. Despite that, the officers and staff we spoke to say the system has few benefits. In some isolated areas, effective regular meetings and conversations take place between persons and their line managers but this practice is not consistent across the force. The PDR is not used to grade performance, identify talent or support career development. It is not part of the promotion process, or the process whereby a person applies to move to another role, either. There is online guidance for completing and managing the process but supervisors say gaps still exist in their understanding of it.

The force also is not always effective at using the processes designed to tackle and improve poor performance, known as unsatisfactory performance procedures (UPP). Measuring the data from the force on complaints against data from other forces reveals a lower use of UPP. However, supervisors and managers rarely receive information, support and briefing material on how to initiate such procedures and develop and put into use an appropriate support plan. This means the force cannot be confident that fair processes are in use to tackle poor performance.

Identifying potential senior leaders

A number of techniques form part of a wider talent management strategy that is designed to identify future leaders. These include psychometric testing to identify preferred leadership styles as well as 360-degree feedback, coaching and mentoring. The force is developing its capability to support the identification of talent through the provision of 60 trained and accredited coaches and 12 mentors. However, beyond formal national schemes, such as the higher potential development scheme – now called Fast Track – the force does not have its own talent management programme. There is no direct entry for inspectors or superintendents. The force's expectations of what it wants from its leaders are rarely included as part of an individual's performance review. This means that there is no structured method of identifying and developing officers. Other than attending sergeant and inspector programmes, police staff leadership development remains inconsistent.

Selecting leaders

The workforce is involved in developing leadership expectations and a mechanism exists to encourage the workforce to feel involved in developing and supporting changes in the way that the force operates. Promotion is more open and accessible and mechanisms ensure these processes match current best practice. Despite that, some officers and staff we spoke to complained of a lack of range of styles, approaches and backgrounds in their leaders and felt that a stereotypical view of leadership existed. However, the force has introduced blind marking of application forms, and staff associations have the status of observers on interview panels. For senior positions, the selection process includes questions put by the workforce. The chief constable is committed to making the annual promotion process transparent. This means that people can plan how they will collate their evidence and receive support to do so. A recent review of the process that is used to select candidates for temporary promotion involved the police federation. This is a positive step. Overall, the workforce generally values the current arrangements for selecting leaders and perceives them to be fair.

Summary of findings

Requires improvement

Nottinghamshire Police requires improvement in some aspects of treating its workforce with fairness and respect. Good progress has been made in some areas and leaders have a good understanding of workforce perceptions. However, officers and staff do not always feel able to challenge and provide feedback to senior managers. The force is proactive in the way it identifies and resolves workforce concerns and its grievance procedure is perceived as fair.

The force is making considerable effort to encourage people from diverse or under-represented communities to join the force. However, the force recognises that it could still do more to improve diversity within its senior ranks.

Nottinghamshire Police has a good understanding of the risks and threats to the wellbeing of its workforce. It is developing a wellbeing action plan to prioritise the most important concerns, such as the ability to take entitled leave and time off. The force has a comprehensive and accessible wellbeing programme and it promotes a preventative approach to improving workforce wellbeing.

The force is only partially effective at managing and developing individual performance. The new performance development system is not effective and the workforce does not view it as useful. The force cannot be confident that it has fair

processes to tackle poor performance. It has no structured method for identifying and developing talented individuals. However, the workforce views leadership selection and promotion processes as fair.

Areas for improvement

- Force leaders should improve the extent to which they prioritise workforce wellbeing, particularly to ensure staff receive their entitled leave and time off to support their health and wellbeing.

- The force should make sure that it develops – and supports its supervisors and managers in conducting – fair and effective assessments, supporting continuous professional development and managing poor performance.

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 staff[38]. The data are the actual full-time equivalent (FTE) and data for 2016/17 are as at 31 March 2017.

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

Ethnic diversity and gender diversity

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

Grievances

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

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[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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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 Nottinghamshire 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

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[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 practice[40] to answer the following questions:

- Access to the system – Has the force identified those cases where the complainant requires additional support to make their complaint, and has that support been provided?

- Initial information – When the complaint was recorded, did the force provide the complainant with a copy of the complaint record, an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing (including contact details)?

- Keeping complainants updated – Has the force provided complainants, witnesses, and those who are the subject of the complaints with regular, meaningful updates?

- Final outcome – Did the force provide the complainant with the findings of the report, its own determinations and the complainant's right of appeal?

- Handling discrimination – Has the force failed to identify any allegations of discrimination? Have any discrimination cases that meet the IPCC mandatory referral criteria been so referred? Has the force investigated the complaints alleging discrimination satisfactorily? Overall, has the complainant making an allegation of discrimination received a good service from the force?

- Grievances/workplace concerns – Has the force identified, investigated and resolved the grievance satisfactorily? Has the force put arrangements in place to support the employees or witnesses throughout the process? Did the witness and those who are subject to the allegations receive a satisfactory service from the force?

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[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.