

PEEL: Police legitimacy (including leadership) 2017

An inspection of Thames Valley Police



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Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7,181

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



Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

5.0%



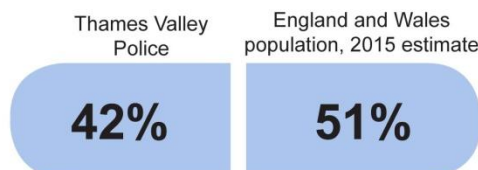
Percentage of BAME in local population, 2011 Census

15.4%

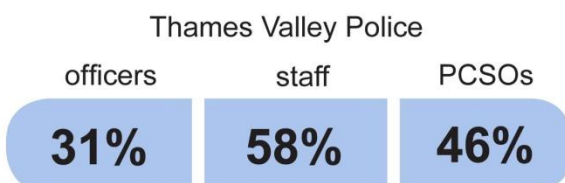


Gender diversity

Percentage of females in overall workforce 31 March 2017



Percentage of females by role 31 March 2017





Grievances

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

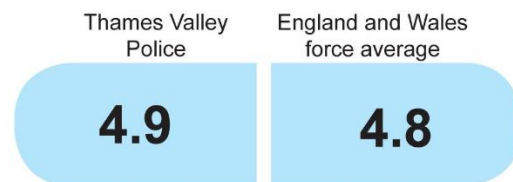


Stop and search

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

11,613

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



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

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

Overall judgment⁴



Thames Valley Police is 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 good at treating the people it serves with fairness and respect. It is also good at ensuring its workforce behaves ethically and lawfully and good at treating its workforce with fairness and respect.

Overall summary

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



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



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



Thames Valley Police treats the people it serves with fairness and respect. The workforce receive the training it needs to perform their duties fairly and respectfully. This includes training on unconscious bias, effective communication skills and coercive powers such as use of force and stop and search. The force monitors its use of coercive powers to ensure they are being used fairly. It has recently improved its scrutiny of the use of force to help identify any disproportionality in its use. Independent advisory groups provide external scrutiny, although the force could better publicise these groups and provide group members with training to support them in their role.

The force is good at ensuring its workforce behaves ethically and lawfully. All members of the workforce receive training in ethical decision making. The force has groups that consider ethical issues, which could be improved by including external members. Information about how to make a complaint is available on the force

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

website, but printed information was not available in the force enquiry offices we visited. The force investigates most complaints well and provides complainants with clear information, but it could improve the timeliness of its updates. It is good at identifying discrimination and investigates these complaints well.

Thames Valley Police treats its workforce with fairness and respect. The force seeks feedback and challenge and has a good understanding of the issues that concern the workforce. It is creating a new diversity plan to address disproportionality in its workforce, particularly to attract more candidates from a BAME background. The force has a very good understanding of workforce wellbeing and provides a wide range of wellbeing and support services. It has a well-established talent management programme and has also introduced a new promotion process to remove potential bias and encourage different leadership styles. However, the one to one meetings between staff and supervisors that form part of the force's individual performance assessment are not being used consistently and the scheme is not always valued by the workforce.

Areas for improvement

- The force should ensure that it supports the work of the IAGs by providing training for members and by providing clearly accessible information about their work, and about how to become a member, on the force internet.
- The force should ensure that its arrangements to scrutinise use of force by its staff incorporate greater use of external scrutiny.
- The force should do more to ensure it has made comprehensive arrangements to provide information and support to people who may wish to make a complaint against the police, in particular when they come from a group that might find this difficult or is less likely to engage with the police.
- The force should consider how it could ensure that the ethical implications of its policies and procedures are reviewed systematically and in a way that incorporates an external view – and that officers and staff are aware of how to raise ethical issues within the force.
- The force should do more to ensure that officers and staff have confidence in the grievance procedure and the new promotion assessment processes. The force should refresh the processes and provide more information to the workforce about them.

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

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

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

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

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

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

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

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

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

Understanding the importance of treating people with fairness and respect

Senior leaders in Thames Valley Police demonstrate a strong understanding of the importance of treating people with fairness and respect and consider the Code of Ethics an integral part of all policy development. The force has incorporated the code into its own commitment, which in turn informs the chief constable's delivery plan. The force conducts specific, comprehensive training on the code, which forms part of other training as well, such as training on the use of force (UoF). Training on procedural justice forms part of the force's leadership programme, which describes the role that leaders must take in promoting fair treatment. Consideration of fair treatment can be seen in all aspects of the force's work with the public. For example, it is working with partners to improve its communications with communities that normally would not engage with the force. Its' SaVE⁹ training is providing officers with the skills and knowledge they need to encourage victims to make themselves heard in the criminal justice process.

Understanding of unconscious bias

All the frontline officers and staff in Thames Valley Police we spoke to during our inspection, including special constables, had been trained to recognise unconscious bias and spoke confidently about their ability to do so. Although the force has not conducted specific training in unconscious bias, the subject is included within other courses on matters such as diversity, stop and search, use of force and professional decision-making. In our conversations with officers and staff, we heard a number of examples of how they had recognised and overcome their own unconscious bias when dealing with particular groups of people. It was interesting to hear how one officer, for example, had reconsidered his own unconscious bias following a domestic abuse case. Contrary to his initial assumptions, the victim was a large man while the offender was his wife. This case had prompted the officer in question to adjust his original assumptions of the matter.

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

⁹ SaVE training is a training course designed by Thames Valley Police through which it trains staff to deal with Safeguarding, Vulnerability and Exploitation.

Communication skills

Frontline officers and staff in Thames Valley Police receive training and guidance on the importance of effective communication skills to improve their work with the public. During our inspection, the officers and staff explained that communication skills had been included in the training packages that frontline officers and staff had received over the previous 12 months. We received specific examples of how the force provided training in communications skills as part of courses on officer safety, diversity and child and adult protection. This training is based on the principles of LEAPS, which stands for: listen, empathise, ask, paraphrase and summarise. Officers supplied us with various examples of situations in which they had used these principles to de-escalate conflicts and, in another case, to prevent someone who exhibited suicidal intentions from harming themselves.

Use of coercive powers

All officers and staff in Thames Valley Police for whom such training is relevant have received effective training and guidance on how to use their coercive powers, including stop and search powers, fairly and respectfully. Frontline officers all receive training on the use of force when they join. Later, they undergo two days of refresher training each year. The training is in line with the College of Policing's authorised professional practice. It covers the use of force powers, communication skills and an awareness of when the use of arrest and stop and search powers is necessary. It includes learning based on scenarios and the use of YouTube and corporate videos to highlight the difference between good and poor practice.

During our inspection, the frontline officers we spoke to without exception showed a good level of knowledge about how to use their coercive powers fairly and respectfully. On a number of occasions we heard also that the supervisory officers who are responsible for authorising the detention in police custody of arrested people question the arresting officers about the necessity of any arrests they have made. This level of scrutiny serves to further remind officers that they should carefully consider whether the exercise of their powers of arrest is necessary.

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

HMICFRS continues to examine the extent to which forces work to identify and understand what affects people's perceptions of fair and respectful treatment. This year we re-assessed a specific aspect of fair and respectful treatment that we examined in PEEL 2015: the use of force¹⁰ and stop and search powers. Specifically,

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.

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

Thames Valley Police complies fully with the national recording requirement on the use of force. It goes beyond the requirements laid out in the National Police Chiefs' Council (NPCC) 2017 guidelines, by recording additional data to increase the amount and quality of information available. It has standardised its monitoring of the use of force in conjunction with Hampshire Constabulary. In February 2017, the forces formed a centralised unit to manage the training and monitoring of the use of force across both forces, using common operating procedures and practices. An IT-based system captures data from officers in order to reduce the amount of bureaucracy. It gives it easy access to a range of data about the use of force, including the ability to identify its disproportional use. The force has also modified the electronic version of witness statements, which identifies when force has been used and creates a use-of-force form for the officer to complete. This has helped to improve compliance with recording standards. We found that the staff were aware of the need to record their use of force.

Analysis of the data on the use of force is submitted quarterly to a scrutiny group. Chaired by a senior officer, this group identifies trends and learning about the type of force being used. The range of data that the force obtains concerning the use of force now allows the group to identify whether force is being used in a way that affects different communities disproportionately. However, at the time of the inspection, this extension of scrutiny to include this area had only started recently. As a result, the force has not identified any learning from this as yet. The scrutiny group also provides some limited external scrutiny, as it includes representatives from the office of the police and crime commissioner (OPCC). In addition, the unit that monitors the use of force across Thames Valley Police and Hampshire carries out a limited amount of dip sampling of body worn video (BVW) footage and custody videos. Results and issues they identify are fed back to local policing area (LPA) commanders.

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

External scrutiny to improve treatment

Thames Valley Police generally has good arrangements to encourage external scrutiny of its actions. Each LPA has an independent advisory group (IAG) with an independent chair. A strategic independent advisory group (SIAG), also with an independent chairperson, provides advice at a force level. The issues that this group has looked at include complaints, representation of black, Asian and minority ethnic (BAME) groups in the workforce and use of stop and search. Both local and strategic IAGs are involved in examining the quality of the equality impact assessments that the force completes. Representation of the communities of Thames Valley on the IAGs is broad and varied. It is encouraging also to learn that youth IAGs operate in some areas. While this enables the force to hear the views of young people, the force recognises that it needs to do more to do in this area.

The SIAG oversees membership of the IAGs and, whenever necessary, takes action to alter the composition of the groups. We heard from one LPA commander who had recently changed the makeup of an IAG to help it to provide the more informed challenge that was required. As part of our inspection, we attended a meeting of the SIAG. We found that those present were independent and not afraid to provide challenges to the force. It is clear that the force values this scrutiny. For example, it used IAGs recently to advise it on the new operating model it has introduced and on the use of spit guards. Despite this, the force could do more to make these groups more effective. IAG members receive an information pack to support them in their role, but no training. In addition, it is hard to locate any information publicising the role of IAG members and inviting people to apply to join. Furthermore, the force internet site does not publish up-to-date minutes of the IAGs that that would inform people about the work they do.

A facility on the force's internet home page allows members of the public to submit feedback on any subject. All feedback is analysed, particularly if it involves a complaint against the police. Trends are brought to the attention of the relevant LPA commander. In addition, a complaints integrity and ethics panel (CIE), meets every two months. Its panel comprises members of the public, split equally in terms of gender and including representatives of the BAME community. This panel decides itself what area of the force's activity it wishes to examine, focusing on those that have most impact on public perceptions of police legitimacy. For example, it has looked at the force's handling of complaints, use of force and its vetting policy. It has summoned senior police officers to attend the panel over cases of particular concern. For example, it asked a senior officer in charge of the roads policing unit to account for the high numbers of complaints of incivility made against his staff. This shows that the force is open to feedback and challenge.

How fairly does the force use stop and search powers?

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

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

Understanding of national guidance

All frontline officers in Thames Valley have received effective training in how to use stop and search powers. This includes considerations of ethics, of unconscious bias and of the negative effect that disproportionate use of the powers can have on perceptions of police legitimacy. During our inspection, all the officers we spoke to had a good understanding of the powers. They were able to describe how they would use the National Decision Model along with the Code to inform their actions. Officers may complete the stop and search forms on their mobile data terminals, which is a good use of technology and also checks whether the details and grounds are identified and recorded correctly. However, the force could make better use of the opportunities that BWV equipment create in terms of stop and search activity. We found that although this equipment was available, some officers said that it was

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

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

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

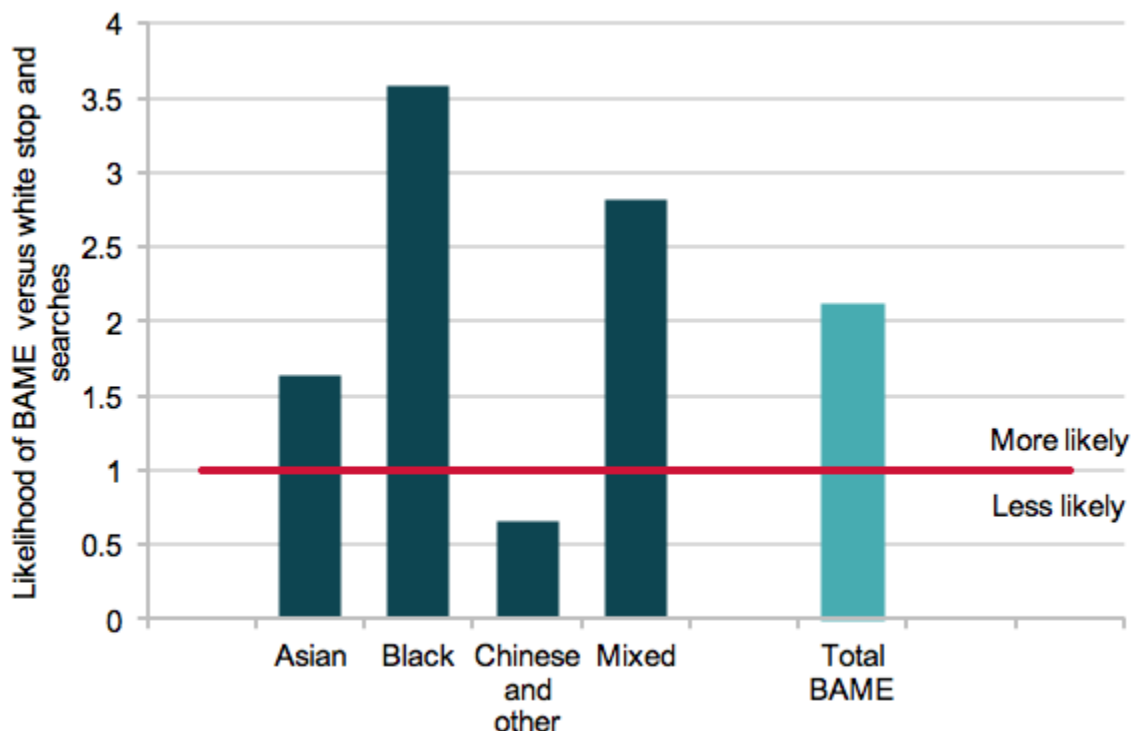
¹⁵ See annex A for more information about the methodology for our review of stop and search records.

their personal choice whether to use it or not. Among the many disadvantages of this optional approach is the loss of opportunities to record stop and search activity that would aid monitoring and learning.

Monitoring use of stop and search powers to improve treatment

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In 2015/16 in the local population of Thames Valley Police, black, Asian and minority ethnic (BAME) people were 2.1 times more likely to be stopped and searched as white people. Black people were 3.6 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, while people with mixed ethnicity were 2.8 times more likely.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)¹⁶ compared with white people, in the local population of Thames Valley Police in the 12 months to 31 March 2016



Source: Home Office 2016

¹⁶ Police and Criminal Evidence Act 1984. Available at: www.legislation.gov.uk/ukpga/1984/60/section/1

The force has an effective way of scrutinising officers' use of powers to stop and search, which involves stop search champions monitoring the use of the powers on each LPA and who attend a quarterly force-wide stop and search meeting that the assistant chief constable (ACC) chairs. At this meeting, senior officers obtain an overview of the types of stop and search activity that is taking place. This includes detailed information on the overall numbers of stop and searches in terms of age, ethnicity, location, the officer carrying out the search, the reason for the search and whether the item searched for was found. This is then broken down in terms of each LPA. A stop and search champion on each LPA reviews any stop and search record that identifies that someone has been searched repeatedly. The LPA commander also reviews all stop and search records involving people under 18. This meeting helps senior officers understand the types of stop and search activity being carried out and whether or not the power is being used to combat current force priorities. However, the force tells us that stop and search powers are used to search for drugs in 60 percent of cases. In our review of 200 stop and search records, we found that 131 were for drugs and, of those, 120 were for low-level possession and not the more serious supply-type offences. The force should reassure itself that this high rate of searching for low-level possession of drugs does indeed fit with its force priorities.

The force is aware that it searches a disproportionately higher number of BAME people than it does white people. Through its monitoring processes described above it has developed a good understanding of the reasons behind this. It continues to monitor overall trends and activity that disproportionately affect a community or individual, making sure that all any disproportionate use of stop and search is properly monitored and understood.

The meeting also plays a role in assisting organisational learning. For instance, recently it noted that the success rate for searches that officers from specialist units conduct is higher than the force's average. It has now undertaken work to understand the reasons for this difference.

External scrutiny of stop and search powers to improve treatment

The use of stop and search powers by Thames Valley Police is subject to external scrutiny through the IAGs, and to a lesser extent, through the CIE panel referred to earlier. A specific stop and search IAG (SSIAG) reviews overall trends in stop and search and views BWV footage, if it is available. The chair of the SSIAG also attends the SIAG to update that group on its work. During the inspection, HMICFRS watched a presentation that the force gave to the IAG on the previous year's stop and search activity. It was interesting to note how open the force was, providing the IAG with the same level of detail that it gave to the force's internal stop search monitoring group, which HMICFRS had also attended.

Both the SSIAG and the SIAG have independent chairs. We saw how willing the IAG members were to challenge and question the force. However, as mentioned earlier, IAG members receive no specific training and the force provides little up-to-date information on the work of the SSIAG. It is unclear how people can apply to become a member.

Reasonable grounds for use of stop and search

The Police and Criminal Evidence Act 1984 requires that, to stop and search a person, the grounds to suspect that person of being in possession of a stolen or prohibited article must be reasonable. The grounds must also be recorded on the stop and search record.¹⁷

In our 2013 inspection into the police use of stop and search powers,¹⁸ we were concerned to see that, of the 8,783 stop and search records we examined across all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power. For Thames Valley Police, the 2013 inspection showed that 50 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,¹⁹ we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, our review of 100 records found that 16 did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 200 stop and search records; five of these records 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 in reality at the time of the stop and search.

In 44 of the 200 records we reviewed, the item searched for was found. This is an important measure, as the primary purpose of the powers is to confirm or allay an officer's suspicions. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

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

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

¹⁹ *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	50 of 200	16 of 100	5 of 200
Item searched for found	-	-	44 of 200

Summary of findings



Good

Thames Valley Police is good at treating all the people it serves with fairness and respect. Senior leaders consider the Code of Ethics in all policy development and the workforce receives effective training on the code. Frontline officers and staff receive training on unconscious bias and effective communication skills and can demonstrate a good understanding of them. Training on coercive powers such as stop and search and use of force ensures that officers understand how to use these powers fairly and respectfully.

Thames Valley Police monitors its use of force and now gathers data that will help it to identify any disproportionality in its use. The force also monitors its use of stop and search well. Independent advisory groups provide effective external scrutiny of the force's activities, including the use of force and stop and search. However, the force could improve their effectiveness by providing group members with training and publicising their work.

Areas for improvement

- The force should ensure that it supports the work of the IAGs by providing training for members and by providing clearly accessible information about their work, and about how to become a member, on the force internet.
- The force should ensure that its arrangements to scrutinise use of force by its staff incorporate greater use of external scrutiny.

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

In HMICFRS' 2017 legitimacy inspection, we continued to focus on the extent to which forces develop and maintain an ethical culture to reduce unacceptable types of behaviour among their workforces. We also returned to look at how well forces are handling complaints and misconduct cases,²⁰ as opposed to last year's focus on how well forces are guarding against corruption.²¹

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

Research tells us that the best way to prevent wrongdoing is to promote an ethical working environment or culture.²² Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.²³ Officers and staff should feel confident that they can apply these principles to their decision making. This year, we focused on the way that the leaders of forces demonstrate ethical behaviour and the way that forces approach ethical decision making across the entire workforce. In addition, where forces had failed to comply with all aspects of the national vetting standards in 2016, we assessed whether their plans are credible and are likely to be compliant by December 2018.²⁴

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

²¹ We did, however, undertake a review of forces' plans in response to our PEEL legitimacy 2016 national report recommendation. The report of our findings is available here: www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016/

²² *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
The role of leadership in promoting ethical police behaviour, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf

²³ *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx; *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

²⁴ HMICFRS' recommendation in December 2016 was that (i) Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so and (ii) Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. The ACPO/ACPOS National Vetting Policy was

Leaders as ethical role models

Leaders in Thames Valley Police consider the ethical implications of their actions routinely. During our fieldwork, officers and staff told us that senior leaders set a good example of ethical behaviour and are open to feedback and challenge. The force has incorporated an assessment of the use of ethics as part of the annual performance review process, requiring leaders to provide examples of their own ethical decision making. Consideration of ethical decision making forms an integral part of the promotion process for police officers and staff and helps to promote ethical behaviour at all levels. Groups are in place across the force that are designed to drive ethical decision making. They comprise:

- The complaints integrity and ethics panel (CIE), as described earlier.
- A separate, internal integrity sub-group, which monitors the use of vetting, business interests and gifts and hospitality; and
- A network of ethics champions, representing each department and LPA, who meet together to share learning and who have drawn up ethics action plans for each area. These champions are intended to act as a source of advice on ethical issues.

There is no doubt that the leadership of the force is committed to demonstrating ethical behaviour, but it could make some improvements. Despite the work of the integrity sub-group, not all the information on the force's internet site about chief officer business interests and gifts and hospitality was up to date. In addition, the work of the formal groups and the ethics champions is not well known among the staff. This limits what otherwise would be an effective way for members of the workforce to raise ethical concerns.

Ethical decision making

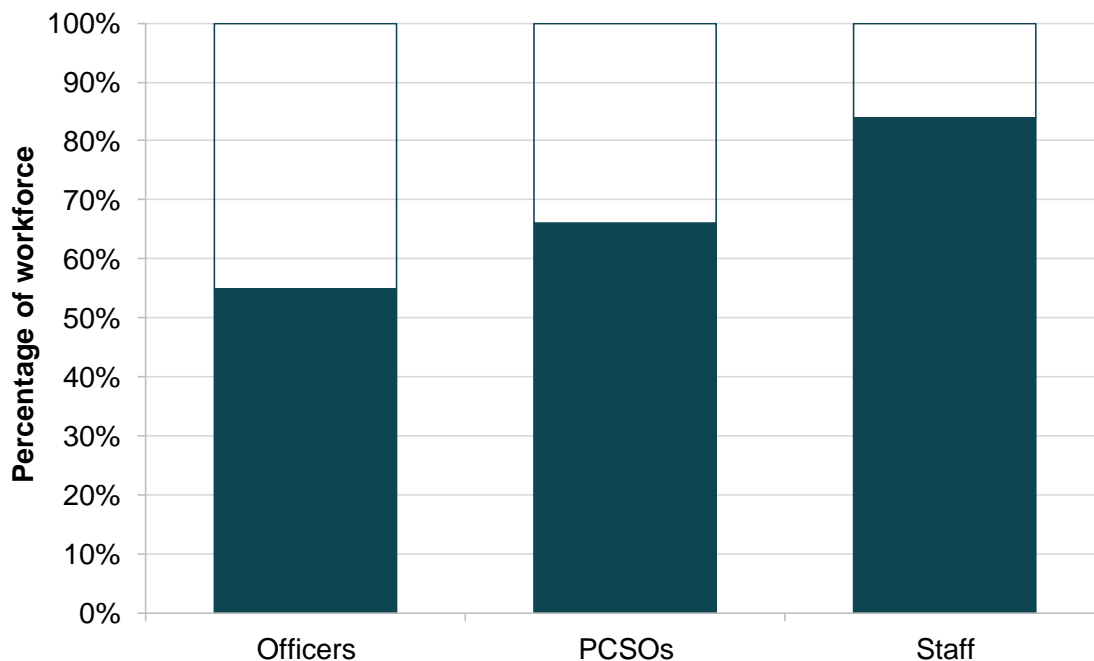
Force policies comply with the equality duty but ethics panels do not assure them routinely. The force considers the ethical aspects of all of its policies and change programmes when projects are at the initiation stage. This is when they receive an equality impact assessment. The CIE panel considers all new policies that the HR department develops. The professional standards department (PSD) also obtains advice from it on ethical issues. This goes some way to ensuring that the force considers ethics in all of its policies and procedures. However, no single group incorporating an external voice advises the force on all its policies and procedures. This means that the ethical considerations of policies and procedures do not always benefit from external scrutiny and expertise.

The force has taken extensive, commendable steps to train officers in ethical decision-making, however. All officers and staff, including special constables, have completed the professional decision-making course, which focuses on the Code of Ethics and includes ethical dilemma scenarios. All new members of staff receive training on the Code of Ethics. Furthermore, officers and staff informed us that they had refreshed their training on ethics as part of other training. Publications from the PSD remind them of the standards of behaviour expected of them. The role of the ethics champions is designed to emphasise the importance of ethical behaviour. Documents that the force supplied showed us how local and force action plans involve the continued use of training on ethical decision making.

Vetting

It is important that re-vetting takes place regularly and before an individual is promoted or posted to a high-risk unit. During this year’s inspection we asked Thames Valley 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, 60 percent of officers, 65 percent of PCSOs, and 86 percent of staff had up-to-date security clearance, as illustrated in figure 2.

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



Source: HMICFRS Legitimacy data collection

During our 2016 legitimacy inspection, we considered the extent to which the force was developing and maintaining an ethical culture through an effective vetting process. We found then that Thames Valley Police did not comply with all aspects of the national vetting standards because it had failed to routinely re-vet all staff that

had not been vetted in the previous 10 years.²⁵ During this year's inspection, we assessed the force's plan to deal with this, and found it had a credible plan. The force is not fully compliant with national vetting policy because, as of July 2017, 30 percent of its staff had not been vetted in line with national guidance. But, following our inspection last year, the force has employed an extra two staff within the vetting unit. The force is focusing first on vetting all staff that have not been vetted at any point, then on vetting staff who need renewals or enhanced vetting on the basis of risk assessment. For example, the force's priority to vet any member of staff who is being transferred into a role that carries a higher risk of corruption or who has come to the notice of the force as a result of inappropriate associations. The force estimates that within two years, it will have vetted all staff at least once. However, it recognises that some staff will not have been re-vetted after a 10-year period has elapsed. The force has supplied us with figures that indicate that these staff members then will make up less than 2 percent of the entire workforce, however. The force believes that its systems, designed to identify any risks within this group, are sufficiently rigorous to mitigate any risk that this may pose.

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.

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 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/

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

Ease of making a complaint

The force's website provides clear and easily accessible information about how to make a complaint. This can be accessed through a button on the website, which takes a member of the public to a page containing information about how to make a complaint. The site gives the option of making a complaint by email, by visiting a police station, or by letter. During our inspection, we spoke to staff that receive complaints by phone from the public. We found them knowledgeable about the actions they needed to take. We also visited three police enquiry offices. There, however, we found no information on display explaining how to make a complaint. The only literature available was a general publication about the work of the IPCC. Displaying posters in public areas of police premises such as enquiry offices and custody suites, as well as non-police premises, such as community centres and Citizens Advice, will be of use to people from communities that have less confidence in the police – who may be less likely to complain.

On speaking to enquiry office staff, on two out of the three occasions that we asked, we were told that if a person attending the police station wished to make a complaint, they should use the telephone in the public area of the office. They could then contact the control room concerning the complaint they wished to make. However, this might well dissuade a member of the public from making a complaint. It is also not entirely in line with the expectations that a member of the public might have about making a complaint in person, which the internet site encourages people to do.

Prior to the inspection, we carried out a review of 25 completed public complaints that the force had recorded. We found that the force had supplied extra support to both complainants and witnesses whenever it was required. This contrasted with our experience in the enquiry offices, where there was little on offer in terms of information or advertised facilities to help someone who might need support through the initial process. In addition we did not find evidence of any plan to increase awareness about complaints among communities that may have less trust and confidence in the police and may be less likely to complain.

Keeping complainants updated

The force is good at supplying people who make a complaint against the police with accurate, clear initial information. In our case file review, we looked at 25 completed public complaint cases and at the quality of the communication that the force had provided the complainants with. We looked at communications about the nature of their allegation and the complaint record, the possible ways that it could be dealt with and the final result. In all cases, the force's communications concerning these points met the legal requirements of the Police Reform Act 2002 and Police (Complaints and Misconduct) Regulations 2012 and were clear and satisfactory. The force also identified and provided additional support in the two cases amongst those we reviewed where a complainant or witness required additional support.

This force is less good at keeping complainants and witnesses updated, however. We found that only 21 of the 25 public complaint cases recorded regular updates to complainants. In addition, we also reviewed 13 internal misconduct cases. We found that the force gave witnesses sufficiently informative updates in only five of these cases. We discussed this with the senior officer in charge of the PSD. This officer is relatively new in the post and had recognised this as a problem. Since our review of investigation and misconduct files, he has put in place a process to monitor the timeliness of all updates with the intention of improving performance in this area.

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 force and its workforce are good at identifying and understanding discrimination. Officers and staff across the force that we spoke to during our inspection without exception displayed a good understanding of discrimination. In addition, they could provide examples of where inappropriate comments or behaviour had been identified. Part of the reason for this is the publication by the PSD of misconduct cases in which discriminatory behaviour was a factor. We heard that this had raised awareness of the issue and had reassured the staff that the force takes such matters seriously.

We looked also at how well the force identified discriminatory behaviour within the case files that we reviewed as part of the inspection. We looked at ten complaints and three internal misconduct cases that the force had identified as containing an allegation of discrimination. We looked also at an additional 15 complaints and 10 misconduct cases that we considered might contain unidentified allegations of discrimination. The force told us that an officer who is trained to identify discrimination makes an initial assessment of all misconduct and complaint cases.

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

We were pleased to see that, in the 25 cases we reviewed, which may have contained unidentified allegations of discrimination, we only found one that the force had failed to identify.

To provide external scrutiny, the Police (Complaints and Misconduct) Regulations 2012 require forces to refer serious cases to the Independent Police Complaints Commission (IPCC) if the cases are aggravated because it is alleged that discrimination was a reason for the behaviour. We identified that two of the force's internal misconduct cases that we had reviewed met the criteria for referral. We were pleased to see that both had been referred.

Investigating allegations of discrimination

Overall, the force investigates allegations of discrimination well. We heard from the head of the PSD that all investigating officers are trained to investigate allegations of discrimination. This ensures they have the skills and experience required to apply the IPCC guidelines on handling allegations of discrimination. A senior officer in the PSD assesses all allegations of discrimination in terms of severity. A detective chief inspector based within the PSD continues to supervise all of these investigations, including those allocated to investigators based on LPAs, through personal supervision and monitoring of computer records to ensure these are carried out correctly. A process is in place that makes sure that the records are detailed and accurate. It ensures that complainants and witnesses receive the support they need and are updated in a timely manner.

To judge how effective these processes are, we reviewed 10 cases (amongst the 25 public complaint cases reviewed) that the force had identified as containing an allegation of discrimination. We considered whether the force had investigated all but one of these allegations satisfactorily in accordance with the IPCC guidelines on handling allegations of discrimination.

Summary of findings



Good

Thames Valley Police is good at ensuring that its workforce behaves ethically and lawfully. Senior leaders are good role models of ethical behaviour and are open to feedback and challenge. All members of the workforce receive training in ethical decision-making. The force has groups that consider ethical issues. It could do more to publicise their work and use them more consistently, and should ensure that they include external members.

The force does not yet comply with the national vetting standards and is prioritising vetting for those who have not been vetted before, renewals and high-risk posts. However, it has an achievable plan to comply with the standards.

Information on how to make a complaint is available on the force's website, but there was no force-specific information on display in the force enquiry offices we visited. There was also no information in these offices on how to access support to make a complaint for those who need it or for communities that are less likely to engage with the police. Thames Valley Police is good at providing complainants with clear information, but could improve the timeliness of its updates. The force is good at identifying discrimination and investigates discrimination complaints well.

Areas for improvement

- The force should do more to ensure it has made comprehensive arrangements to provide information and support to people who may wish to make a complaint against the police, in particular when they come from a group that might find this difficult or is less likely to engage with the police.
- The force should consider how it could ensure that the ethical implications of its policies and procedures are reviewed systematically and in a way that incorporates an external view – and that officers and staff are aware of how to raise ethical issues within the force.

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

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

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

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

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.²⁹ HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances³⁰ – to identify, understand, prioritise and resolve their workforces’

²⁸ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

²⁹ *Ibid.*

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

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

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

Leaders seeking feedback and challenge from the workforce

Leaders are good at seeking feedback and challenge from the workforce and use a number of methods to do this, which members of staff generally value. The chief constable has a good level of personal visibility. At the time of the inspection, he was conducting visits to groups of staff across the force area, explaining the new operating model, answering questions and taking feedback. Despite this, our reality testing found that some staff did not feel that the level of communication on this subject had been sufficient.

The force seeks feedback in other ways. They include Yammer, which is an online staff network, an email ask-the-chief facility and staff forums on the LPAs. Staff supplied us with a number of examples of changes that the force had made as a result of their feedback. They included the removal of staff photographs from the internet and changes to the provision of uniform and to the style and content of the standard letters sent out to the public. The force also makes use of return-to-work interviews for all staff that have been away from work owing to ill health. Exit interviews are held with all black and minority ethnic (BME) staff that leave the

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

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

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

organisation. Formal consultation arrangements with staff associations work well. Staff representatives told us that the chief constable is accessible and listens to feedback.

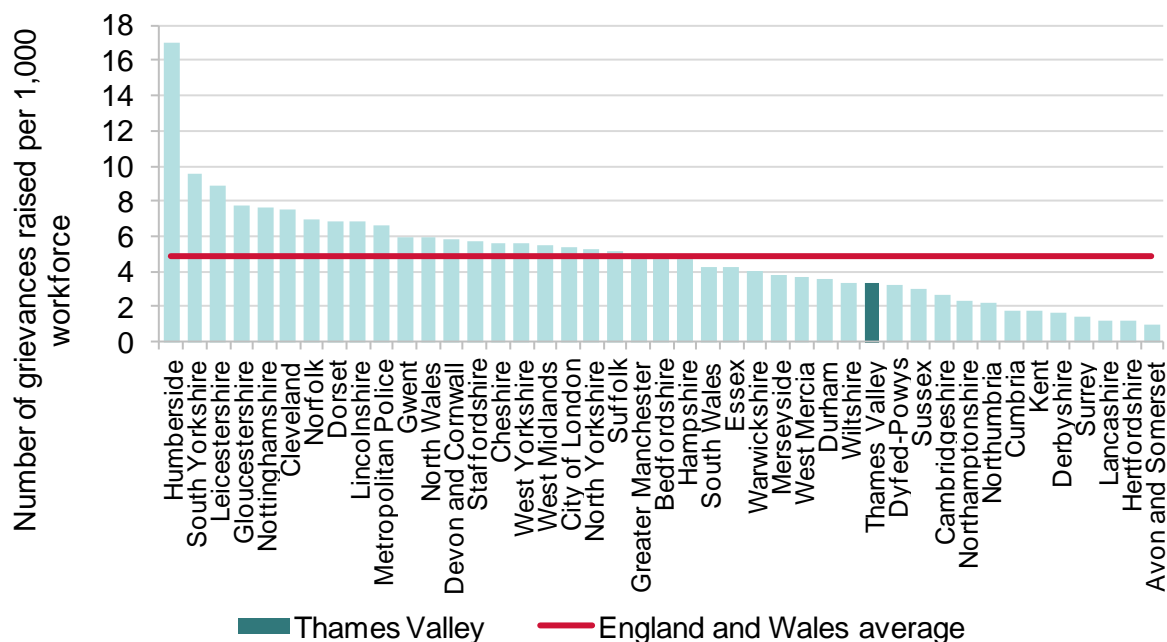
Identifying and resolving workforce concerns

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 Thames Valley Police had 3.3 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

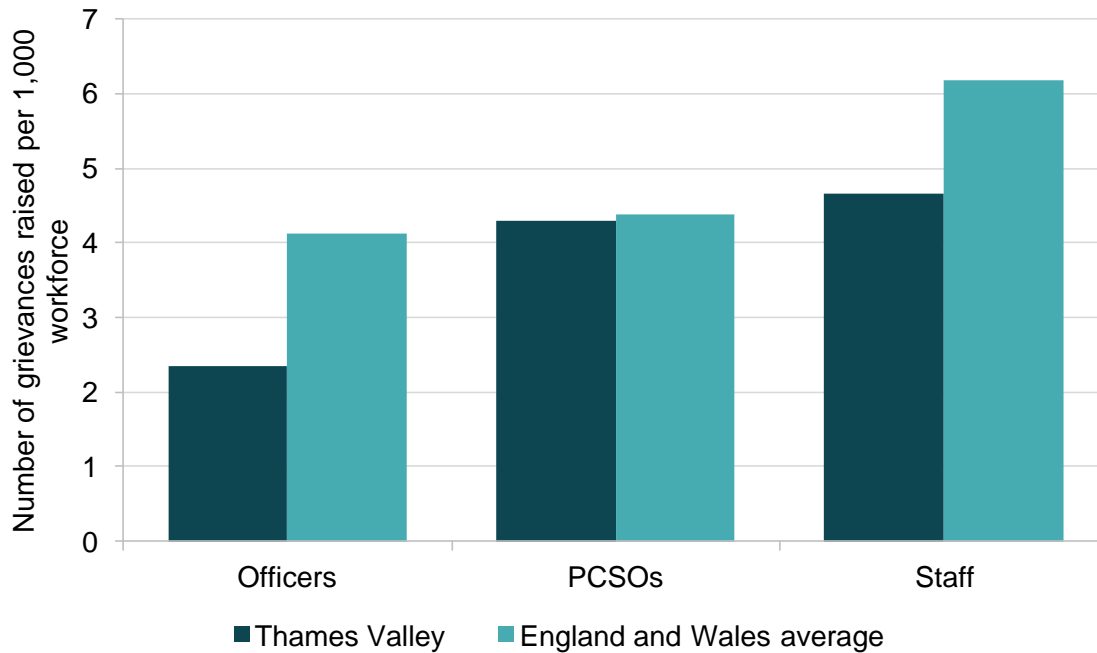
Figure 4 shows that the number of grievances raised by officers in Thames Valley Police was 2.4 grievances per 1,000 officers, and the England and Wales average of 4.1 grievances per 1,000 officers. In the same period PCSOs raised 4.3 grievances per 1,000 PCSOs, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 4.7 grievances per 1,000 staff in the same period; and the England and Wales average was 6.2 grievances per 1,000 staff.

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



Source: HMICFRS Legitimacy data collection

Overall, the force is good at identifying and resolving the concerns of the workforce. It has conducted two workforce surveys in the last three years and will conduct another survey later this year. It uses the results of these surveys well, identifying workforce concerns on each LPA while the LPA commanders develop a local plan involving staff in addressing issues that have arisen. The force has conducted other surveys for specific groups of staff. For instance, as a result of learning from a survey that the Women’s Network conducted, it offers support to staff going through the menopause. The force told us this reflects the approach that the force takes in training its managers, which is to resolve issues at the earliest point possible. However, not all staff that we spoke to expressed full confidence in grievance procedures as a method of resolving concerns, as some said they led often to inconclusive outcomes. None the less, representatives of the staff associations value the procedures. This may indicate that the force and staff associations could do more to promote confidence among the staff in the grievance procedure. The force should ensure it communicates its commitment to all staff who raise a formal grievance.

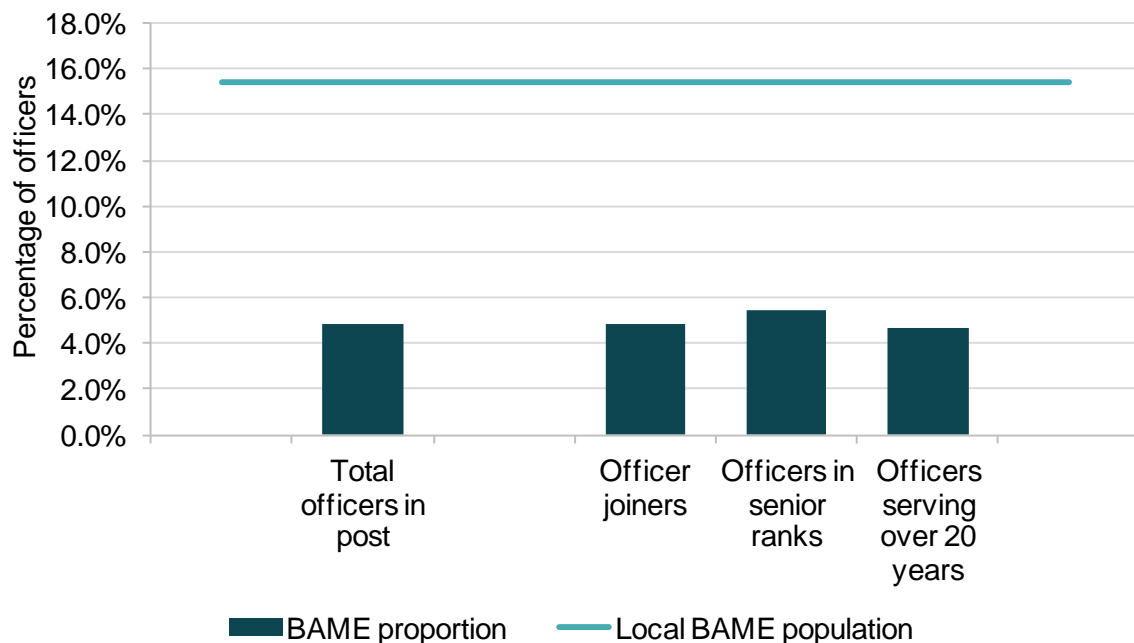
The force also monitors and analyses relevant information on such issues as ill health, grievances and resignations at the force performance management meeting. Further analysis takes place if trends emerge. For instance, we heard of a disproportionate number of grievances, involving allegations of discrimination, in one area of the force. The force analysed these allegations to identify why a perception of unfair treatment had arisen and worked with the staff to resolve them.

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 Thames Valley Police, the 2011 census indicates that BAME people made up 15.4 percent of the local population. In 2016/17, in Thames Valley Police 4.9 percent of officers were BAME (see figure 5). In relation to officers, 4.9 percent of those joining the force, 5.4 percent of those in senior ranks and 4.7 percent of those who had served over 20 years were BAME.

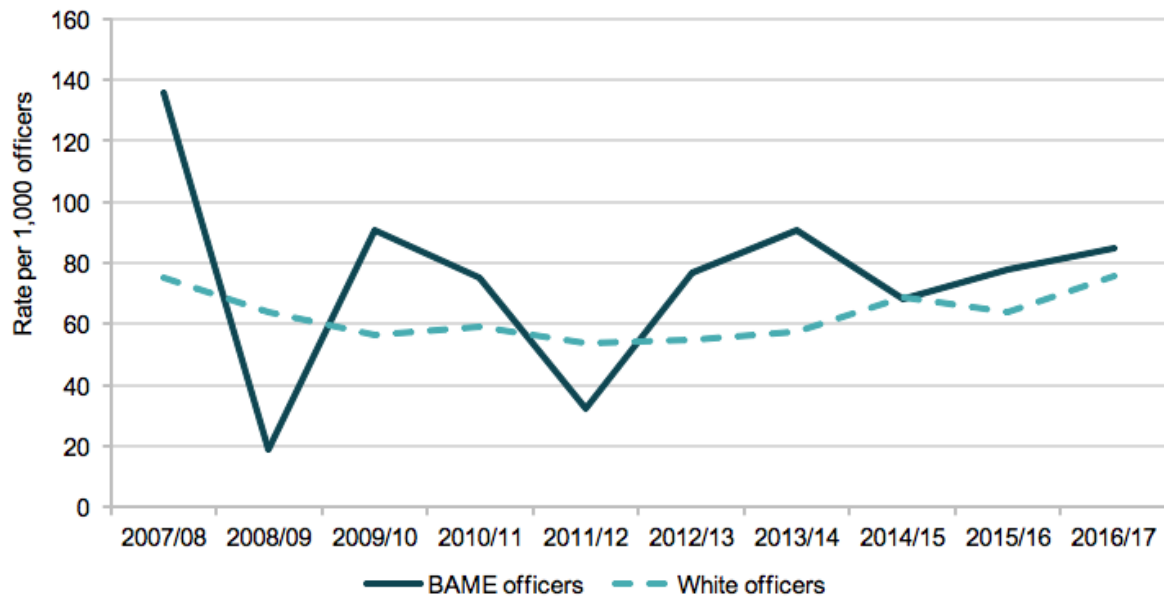
Figure 5: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Thames Valley Police in 2016/17, compared with the percentage of BAME people in the local population



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 Thames Valley Police from 2007/08 to 2016/17

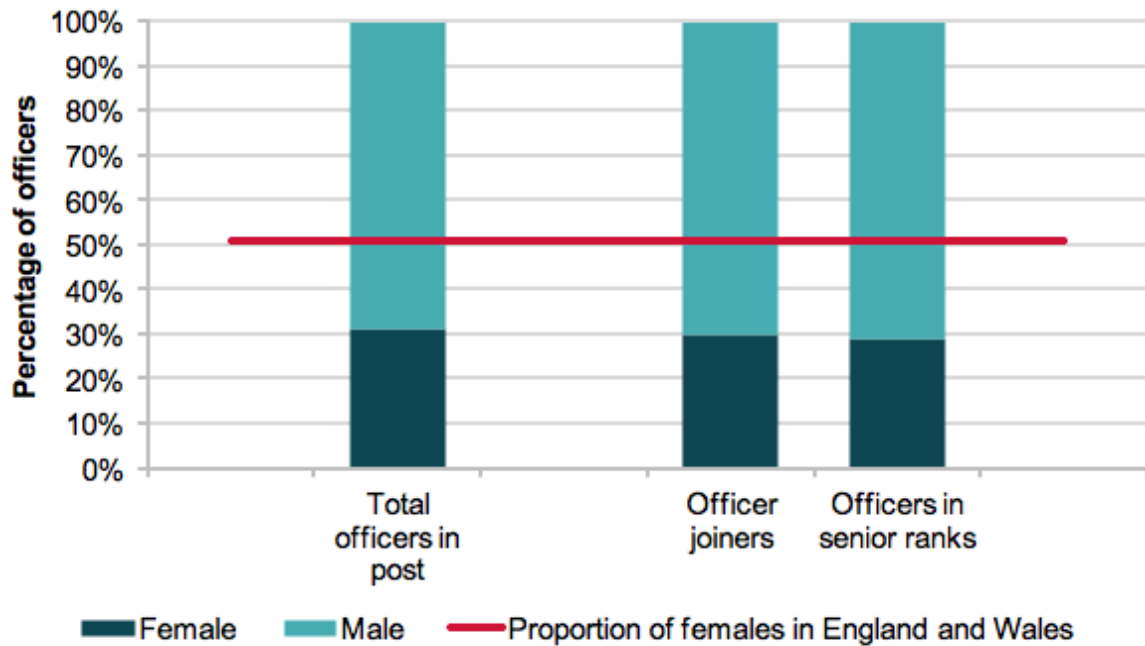


Source: Home Office Annual Data Requirement

In 2016/17 in Thames Valley Police for the equivalent of every 1,000 BAME officers, 85 left the force (see figure 6), while for every 1,000 white officers, 76 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

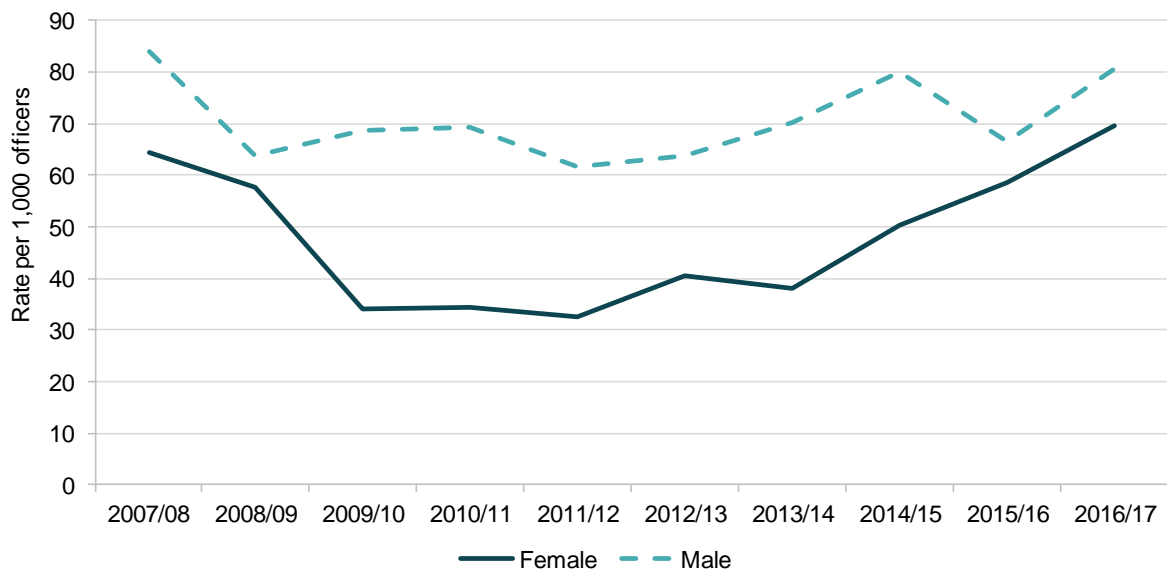
The proportion of female officers is lower than the proportion of females in the general population (51 percent) at 31 percent. In the 12 months to 31 March 2017 in Thames Valley Police, 30 percent of those joining the force and 29 percent of those in senior ranks were female (see figure 7).

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



Source: Home Office Annual Data Requirement

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



Source: Home Office Annual Data Requirement

In 2016/17 in Thames Valley Police 70 female officers per 1,000 officers left the force, compared with 81 male officers per 1,000 officers. Thames Valley Police has a good understanding about the importance of addressing disproportionality amongst its workforce.

The chief constable personally oversees the work that the force is doing to ensure that it does not treat people with protected characteristics differently, by chairing the equality, diversity and inclusion board. The force has an overall understanding, supported by data, of disproportionality in relation to protected characteristics. This knowledge is most detailed in terms of people from a BAME background, who are under-represented in Thames Valley Police. As a result of this monitoring, the force has taken an evidence-based approach to attract, recruit and retain more staff from under-represented communities. These efforts have included amending the academic requirements to allow recognition of a wider range of qualifications, using targeted communication campaigns and giving support to BAME officers in the force through specific development days and programmes.

The force ensures also that BAME officers and staff are not treated differently when they are under investigation for alleged misconduct. It does so by making all initial misconduct severity assessments anonymous. This means that no bias can occur at this stage of the investigation. In addition, the head of HR reviews and compares the final outcomes of misconduct cases once again, to make sure that there are no differences in outcomes relating to staff and police officers that have a protected characteristic. Despite all these efforts, the force does not yet represent all the communities that it serves. The force recognises the need to improve in this area. Its plans include developing an equality and diversity strategy, based around the recently published 'Race in the Workplace' report, to improve the diversity of its workforce.

While the force concentrates on supporting candidates and staff from a BAME background, there is good evidence of the ways it supports staff with other protected characteristics. It has supported women through both the "Springboard" course and the Women's Network. All disabled officers and staff who can no longer perform their substantive roles and who therefore require redeployment receive support from a personal case-worker.

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

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and being more invested in what they do.³⁴ HMICFRS assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

Understanding and promoting wellbeing

Leaders in Thames Valley Police can show that they understand and promote the wellbeing of their staff. Health and wellbeing form part of the chief constable's delivery plan, which sets out the force's priorities. A comprehensive wellbeing action plan includes the prevention of mental ill health. The force has employed staff within its occupational health department to support this. This emphasis on prevention and support is replicated across the force area. LPA commanders are responsible for wellbeing plans in their areas, which help them understand local needs. At an operational level, all supervisors and some constables have been trained to recognise – and know what action to take about – the wellbeing issues affecting their colleagues and staff. Through reality testing, we found that the workforce believes the leadership is committed to its supporting its wellbeing.

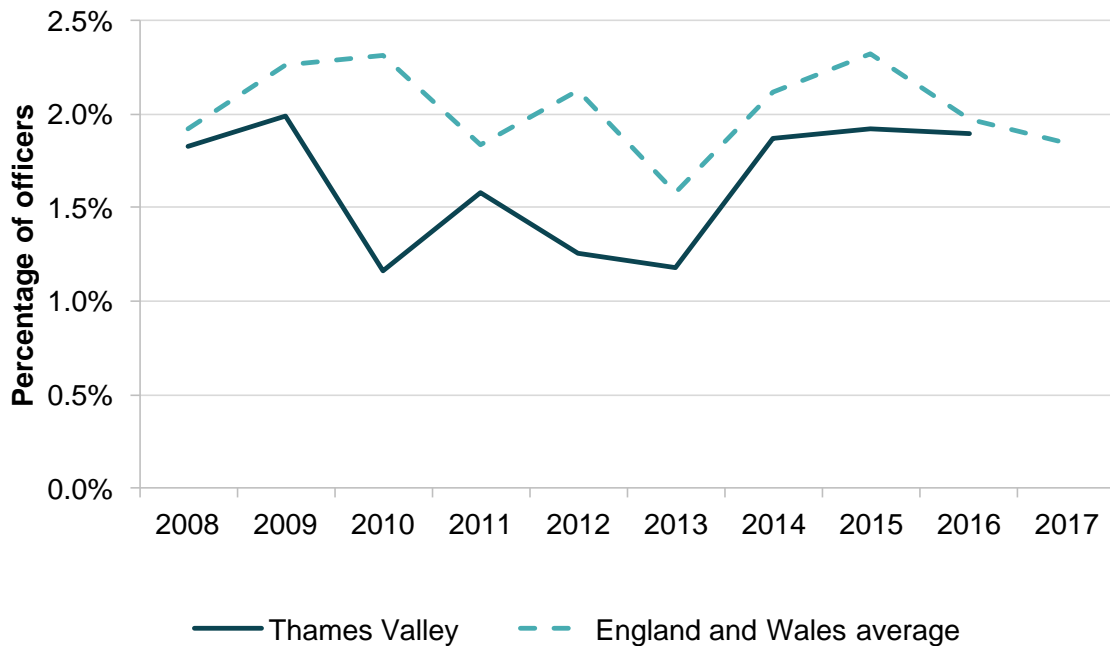
Identifying and understanding workforce wellbeing needs

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

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short/medium-term sickness absence. Thames Valley Police were unable to provide data for the 31 March 2017 at the time of writing. The England and Wales average was 1.8 percent.

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

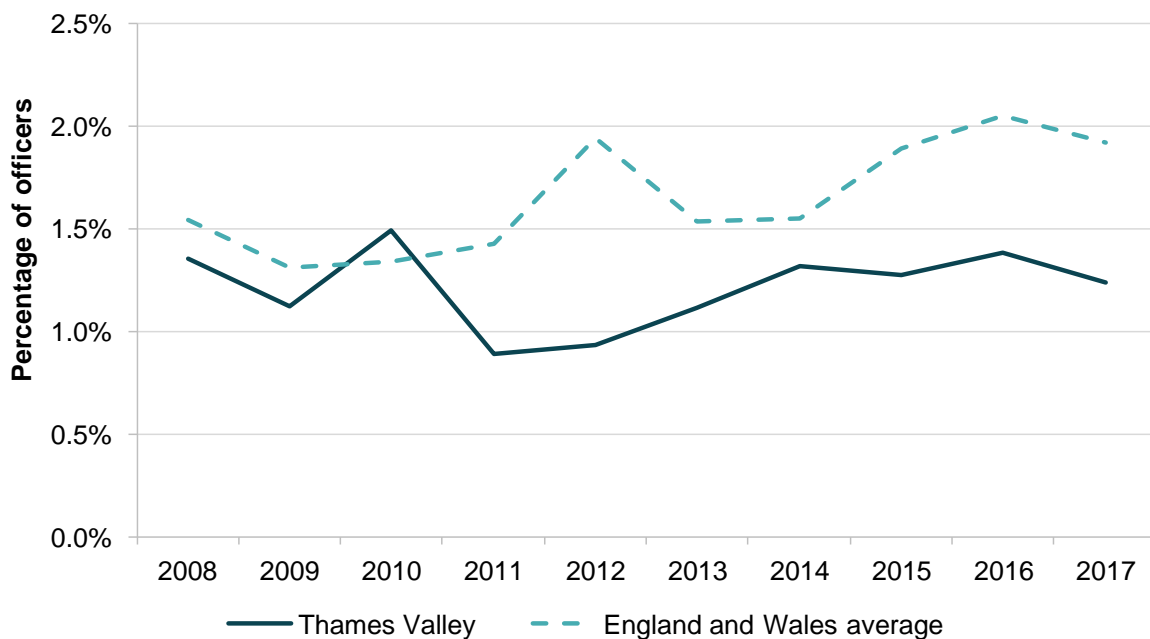
Figure 9: Percentage of officers on short or medium-term sick leave, in Thames Valley Police compared with the England and Wales average, on the 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

On 31 March 2017 the proportion of officers in Thames Valley Police on long-term sick leave was 1.2 percent and the England and Wales average was 1.9 percent. The latest year for which data were available is 2017 which saw a decrease of 0.1 percentage points from the previous year, which is in line with changes in the last ten year period.

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



Source: Home Office Annual Data Requirement

Thames Valley Police has a very good understanding of the wellbeing issues that affect the workforce. We found that the perceptions of senior leaders about these issues matched those that members of the workforce expressed to us. The force takes a sophisticated approach to understanding the threats to the wellbeing of the force. It uses statistical data, such as grievances and sickness rates, along with survey results and liaison with staff associations, to develop what it describes as insights into current and future wellbeing issues. Detailed scrutiny and planning takes place at the force's 'wellbeing group', which is responsible for the force's wellbeing plan. We saw good examples of how this understanding leads to improved provision of wellbeing. For example, a number of initiatives concentrate on supporting the staff's mental wellbeing. One is the 'blue in the loo' campaign, which has involved putting up posters about anxiety in staff toilets, showing staff where they can obtain help. The force expects supervisors to intervene early in tackling wellbeing problems. Each LPA has a local wellbeing plan that the LPA commander oversees. Leadership training that the force provides incorporates the identification and management of wellbeing issues. All members of staff have access to online information about wellbeing and resources.

Taking preventative and early action to improve workforce wellbeing

The force can demonstrate that it takes effective action to improve the workforce's wellbeing. The rate of long-term sickness absence in the force is below the average for forces in England and Wales (see figure 10). It is difficult to quantify why this is so, but the force believes that the effects of the blue light mental wellbeing programme, together with flexible working arrangements, have been positive. Generally, the force provides strong support to members of staff who may be under stress because they are the subjects of public complaints, internal misconduct or grievance procedures. Our review of such cases found that, usually, the force offers the right level of support to those affected. However, the force needs to make sure that the improvements it has made to the management of complaints, described earlier, are maintained. In particular, it should update officers who are subject to complaints more frequently than was the case previously.

A comprehensive wellbeing action plan sets out what actions the force is taking in this area. Wellbeing is included in all induction processes for new staff and in leadership programmes. There are services that deal with debt and finance management, well person clinics, support in terms of achieving fitness standards and peer support schemes. Wellbeing activities target specific groups, such as the menopause workshops for members of the Women's Network, mentioned earlier. In addition, all staff who are in roles that may involve higher levels of stress, such as child protection, receive psychological screening to assess their initial and continued suitability for the role. We received positive feedback from the staff that we spoke to during the inspection about the force's provision of wellbeing. Staff members supplied examples of their own experiences of receiving support. For instance, one officer who had been involved in a stressful incident recalled receiving an unsolicited

email from the force, which reminded him of the welfare facilities that were available, if he required them. This illustrates the positive results of the force's provision of wellbeing.

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.³⁵ 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.³⁶ Also, we looked at how fairly forces identify and select their leaders, and the extent to which these decisions result in leaders who represent a range of styles, approaches and backgrounds.

Managing and developing individual performance

The force has arrangements in place to assess and develop the performance of its staff. However, it does not always use them consistently and not all staff value the performance development review (PDR) process. Thames Valley Police has an online PDR system, which uses the police competency and values framework (CVF),³⁷ to assess the performance of its workforce. The system requires staff to record their continual professional development (CPD). The officer's line manager then assesses this against the CVF. It is an effective way of recording officers' career aspirations, after which appropriate training and development activity can be arranged. As part of their performance review process, most staff set objectives that are linked either to the force's objectives, or to their own personal development.

³⁵ *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.

³⁶ 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

³⁷ The competency and values framework has been developed by the College of Policing and describes the competencies required in a variety of police roles.

However, this is not mandatory for constables. The CVF requires them to demonstrate professional competence and ethical behaviour. The force believes that linking additional objectives to these areas will result in duplication, at a time when it is trying to reduce the amount of unnecessary bureaucracy in the PDR process. The PDR review takes place annually with a formal review at the six-month point. It is expected that more frequent one-to-one meetings will take place with managers in future. The completion level is high, at 81 percent. This is higher than the average for England and Wales.

During our fieldwork, we heard from officers and staff that had used the PDR system to explore opportunities for career development. However, many staff and supervisors, particularly those with no immediate career ambitions, said that they did not value the system. They said also that one-to-one meetings do not take place consistently and that the recording of evidence to demonstrate CPD is time-consuming and is completed solely as an administrative task. This suggests that many staff and their supervisors in Thames Valley Police see the PDR process only as an annual chore that they need to deal with. It means also that development opportunities may be being missed.

Identifying potential senior leaders

The force has fair and consistent processes to select officers and staff of high potential. It offers officers the opportunity to apply for the fast-track constable-to-inspector scheme, which is a transparent, structured way for talented officers to advance within the force quickly. During the past year, six officers applied to take part in this scheme, one of whom was successful. The force offers all staff the opportunity through written applications to apply for the Cambridge Police Executive Programme.

A well established talent management programme is on offer for 30 individuals a year. Officers and staff can nominate themselves or be nominated by their line manager. The application process involves proof of professional competence linked to development through the PDR system. We heard from the force that the makeup of attendees on this course over the past year had shifted in terms of rank or grade. As a result, more junior staff and officers were making use of this development opportunity than in the past. The force monitors where applications are coming from in the force, to make sure that all staff are receiving an equal opportunity to apply themselves, or be nominated. Elements of the process concerning tests for psychometric and emotional intelligence have been professionally designed. The process itself is delivered and overseen internally by the head of leadership. Those who do not succeed have an opportunity to challenge the results and submit feedback. During our fieldwork, we found that staff viewed the process as fair. Their knowledge of the programme had improved since our legitimacy inspection in 2016.

Selecting leaders

Thames Valley Police selects leaders at all levels of the organisation fairly. Its promotion processes are linked to a regular assessment of competency, using the CVF, assessed by a line manager, using the PDR system. Once a candidate is judged to be operationally competent for their role, they may apply for the first stage of the promotion process, submitting a document called 'Why me, why now?' Candidates set out how they work, as opposed to what they have done, because assessing professional competence (with the exception of superintendent roles) is completed as part of the line managers' assessment. Candidates selected to attend a promotion board receive the questions in advance, which means that candidates who have dyslexia, or who struggle to perform in the environment of a promotion board, can prepare themselves better. All candidates receive feedback about their performance once the process has concluded.

The force has introduced this promotion process since our 2016 legitimacy inspection, and it is designed to prevent favouritism in the selection of leaders and create a level playing field. The force has trained its assessors in unconscious bias, and stresses the need for leaders to represent different backgrounds and levels of knowledge. The design of the process draws on national best practice and it was tested with groups of staff before it was put into practice. However, although the force has communicated these changes to the workforce, not all staff that we spoke to understood the new system fully. This resulted in some of them questioning why some people had been promoted as opposed to others. A risk remains, therefore, that the system will not be perceived as fair. The force needs to improve its communications with the workforce to avoid this.

Summary of findings



Good

Thames Valley Police treats its workforce with fairness and respect. Leaders seek feedback and challenge from the workforce and respond by making changes where appropriate. Overall, the force is good at identifying and resolving workforce concerns, although not all members of the workforce we spoke with had full confidence in grievance procedures.

The force recognises that it needs to do more to address disproportionality in its workforce, particularly to attract more candidates from a BAME background. It is planning to develop an equality and diversity strategy to help with this.

Thames Valley Police has a very good understanding of the wellbeing issues that affect its workforce through analysing statistical data (such as grievances and sickness rates) and survey results as well as through working with staff associations.

Leadership training covers identifying and managing wellbeing issues and supervisors are expected to intervene early in tackling wellbeing problems. The force provides a wide range of wellbeing and support services and has a comprehensive wellbeing action plan that includes the prevention of mental ill health.

The force has processes to assess and develop the performance of its workforce, but they are not being used consistently. Although the majority of the workforce complete a PDR every year, it is regarded as an administrative burden and is not valued. Regular one-to-one meetings between members of the workforce and their line manager do not always take place.

Thames Valley Police has a well-established talent management programme for which the workforce can apply or be nominated by their line manager. We found those we spoke with viewed the process as fair. The force has introduced a new promotion process that is based on national best practice to remove potential bias and encourage different leadership styles.

Area for improvement

- The force should do more to ensure that officers and staff have confidence in the grievance procedure and the new promotion assessment processes. The force should refresh the processes and provide more information to the workforce about them.

Next steps

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

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

Annex A – About the data

Data used in this report

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

Methodology

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

Comparisons with England and Wales averages

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

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

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

Statistical significance

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

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

Population

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

Note on workforce figures

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

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

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

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

Force in numbers

Workforce (FTE) for 2016/17

Data may have been updated since the publication. Workforce includes Section 38-designated investigation, detention or escort officers, but does not include Section 39-designated detention or escort staff³⁸. The data are the actual full-time equivalent (FTE) and data for 2016/17 are as at 31 March 2017.

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

Ethnic diversity and gender diversity

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

Grievances

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

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

Stop and search

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

Figures throughout the report

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE) compared with white people, in the local population of Thames Valley 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 Thames Valley Police as at 31 January 2017

Figure 3: Grievances raised per 1,000 workforce, in Thames Valley 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 Thames Valley 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 Thames Valley 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 Thames Valley 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 Thames Valley 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 Thames Valley 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 Thames Valley 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 Thames Valley Police compared with the England and Wales average, as at 31 March from 2008 to 2017

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

Stop and search record review methodology

HMICFRS was commissioned by the Home Office to conduct a further assessment of reasonable grounds, building on the assessments we carried out in 2013 and 2015 so that we could demonstrate any changes over time. We used a similar methodology to do this: forces provided details of stop and search records by working back in time from 7 January 2017 until a total of 200 was reached.³⁹ This amounted to a total of 8,574 records – some records provided were not actually records of stop and search encounters, and these were excluded. As part of our assessment, we gave forces the opportunity to review our findings and make representations.

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

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

Professional standards case file review methodology

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

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

³⁹ City of London Police was unable to provide records up to 7 January 2017 but instead provided 200 records from 4 October 2016 to 26 November 2016.

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

We assessed these case files against the relevant legislation, guidance and code of practice⁴⁰ to answer the following questions:

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

⁴⁰ Relevant police complaints and misconduct legislation, IPCC statutory guidance, IPCC guidelines for handling allegations of discrimination, Acas code of practice on disciplinary and grievance procedures and Acas discipline and grievance guide.